



## **SUPPORTING DOCUMENTATION**

### **QUESTION 8**

**Location:** Newark

**Contact Person:** Ron Kurtz

**Incident Type:** Near Miss - Process Safety

**Date:** 06/12/96

**What Happened?**

A tank was operating with the heat and agitator system activated, resulting in a temperature of 100<sup>0</sup> C. Vapors were emitted through the vent cap located on top of the tank. This condition was discovered by an operator who immediately turned off the heating system.

**Immediate Cause:** The heat and agitator were accidentally turned on.

**Corrective Action:** Investigation is continuing.

842899473

**Location:** Newark

**Contact Person:** Ron Kurtz

**Incident Type:** Spill - Not Reportable

**Date:** 06/12/96

**What Happened?** About 600 gallons of Kelsol leaked from tank in the 4th floor tank farm containment area. Employees cleaned up the spill.

**Immediate Cause:** Tank was overfilled

**Basic Cause:** Investigation of incident is continuing

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842899474

## **NEWARK (CONT.)**

**Incident Type:** Near Miss

**Date:** 06/17/96

### **What Happened?**

An employee was backing a tank wagon onto the new scale. The tank wagon struck the platform safety railing, causing it to bend.

### **Immediate Cause:**

The platform railing was in the lowered position and the driver did not see it when he was backing onto the scale.

**Incident Type:** Spill - Not Reportable

**Date:** 06/21/96

### **What Happened?**

About 5 gallons of 14599 was released onto the yard pavement. The loading line was blown out after loading a compartment, causing the material to splash out.

### **Immediate Cause:**

The volume in the compartment was excessive and blowing out the line displaced material from the compartment.

**Incident Type:** Spill - Not Reportable

**Date:** 06/23/96

### **What Happened?**

50 gallons of Soya oil spilled onto the pavement from a tank wagon. An employee closed the valve going into the tank wagon to stop the release.



**Immediate Cause:** The hose connection failed.  
**NEWARK (CONT.)**

**Incident Type:** Spill - Not Reportable

**Date:** 06/26/96

**What Happened?**

Approximately 1 gallon of product (12035) spilled from the open manway of a tankwagon when backing up to weigh out. The product dripped from the waste storage area to the center of the scale. In addition, the tank wagon contents were not properly identified with a UN1866 placard.

**Immediate Cause:** The dome cover was not secured when the tankwagon was in motion.

**Incident Type:** Spill - Not Reportable

**Date:** 06/26/96

**What Happened?**

An oily substance spill was discovered on the loading station by the main tank farm. A tankwagon ran through the material and spread a thin film over the pavement.

**Immediate Cause:** The cause has not been identified.

**Incident Type:** Spill - Not Reportable

**Date:** 06/26/96

**What Happened?**

An unknown material was found on the ground next to the entrance/exit of Building 31. The material appeared to be a mixture of oil, water and resin material. The spill amount was determined to be less than 1 quart.

**Immediate Cause:** Source and cause for the spill are unknown.

## **NEWARK (CONT.)**

**Incident Type:** Spill - Not Reportable

**Date:** 06/27/96

### **What Happened?**

About 20-30 gallons of 1272 PL were spilled onto the floor of the pressroom.

### **Immediate Cause:**

An employee did not check all of the system valves prior to starting the circulation from the tank to the press. The valve was closed when the spill was discovered.

**Corrective Action:** Procedures are being reviewed.

**Incident Type:** Spill - Not Reportable

**Date:** 06/28/96

### **What Happened?**

About 3 gallons of Linaqua was discovered beneath the drum conveyor/drumming station area.

### **Immediate Cause:**

The spill was released from the automatic drumming system. An employee may have failed to place an empty drum to catch the product.

**Incident Type:** Medical Treatment

**Date:** 06/28/96

### **What Happened?**

A shipping/receiving office employee was exposed to a caustic material. The employee touched the caustic and unknowingly rubbed the material in her eyes. Her eyes were irritated and she experienced burning on her arm and hands. The employee was directed to a shower to flush any residual material from her body and eyes. She was transported to the clinic for evaluation and treatment. She was referred to an ophthalmologist for further evaluation.

**Immediate Cause:** Caustic material leaked through the ceiling above her office work area. Some solution dripped onto her work station and she unknowingly touched the material.

**NEWARK (CONT.)**

**Incident Type:** Spill - Not Reportable

**Date:** 06/30/96

**What Happened?**

Several hundred gallons of caustic wash water flooded the second floor of building 31/32 when the pipeline to the wastewater system became blocked.

**Immediate Cause:**

The volume of wastewater traveling through the pipe moved debris and created a blockage in the line.

4/16/91

# CLEANUP ESTIMATE

## A. MATERIAL

RESINS -  $4500 \text{ GAL} \times 8.2 = 36,900 \text{ lbs}$   
 $\times 0.8/1b = 29,520$   
 N-BUTYL ALCOHOL  $1000 \text{ GAL} \times 6.75 = 6,750 \text{ lbs}$   
 $\times 0.35/1b = 2,362.5$   
 $\frac{3780}{33,300}$

B - LARSEN & EGG  
 VAC TRUCK  
 PICKUP

\$10/HR  
 \$10/HR

## LABOR

FOREMAN	35	$\times 8 = 280$	$\times 12 = 420$
OPER	30	$\times 8 = 240$	$\times 12 = 360$
LAB	24	$\times 8 = 192$	$\times 12 = 288$

4/1 - 2365  
 4/2 2366  
 4/3 2918  
 4/4 3964  
 4/5 3964

4/8 2418  
 4/9 2098  
 4/10 1778  
 4/11 1778  
 4/12 1778  
 $\frac{25808}{25808}$

21-24  
 Docs Re: 4/1/91  
 Spill at  
 Doremus  
 8(b) item 2

REICHHOLD CHEMICALS, INC.

OPERATING RESERVE FUND REQUEST

O.R. Job # OR-01

Distribution: Plant Manager (for approval)

Copies to: Director of Manufacturing  
Division Controller  
Plant Controller  
Maintenance

Cost Center 005

Date 4/9/91

Project Title SPILL CLEANUP

Project Description \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Justification \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Estimated Operating Reserve Funds Required:

Labor \$ 27000

Material \$ 33000

Total \$ 60,000

Estimated Starting Date \_\_\_\_\_

Estimated Completion Date \_\_\_\_\_

Project Originally Budgeted: Yes ☒ No \_\_\_\_\_

Submitted by \_\_\_\_\_

Date \_\_\_\_\_

Approved by \_\_\_\_\_  
(Plant Manager)

Date \_\_\_\_\_

\_\_\_\_\_  
(Director of Manufacturing)

Date \_\_\_\_\_

\_\_\_\_\_  
(Division Controller)

Date \_\_\_\_\_

\_\_\_\_\_  
(Plant Controller)

842899480

REICHOLD CHEMICALS, INC.

OPERATING RESERVE FUND REQUEST

O.R. Job # OR-01

Distribution: Plant Manager (for approval)

Copies to: Director of Manufacturing  
Division Controller  
Plant Controller  
Maintenance

Cost Center 005 Date 4/9/91

Project Title SPILL CLEANUP

Project Description \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Justification \_\_\_\_\_

\_\_\_\_\_

Estimated Operating Reserve Funds Required: Labor \$ 27 000

Material \$ 33 000

Total \$ 60 000

Estimated Starting Date \_\_\_\_\_ Estimated Completion Date \_\_\_\_\_

Project Originally Budgeted: Yes X No \_\_\_\_\_

Submitted by \_\_\_\_\_

Date \_\_\_\_\_

Approved by \_\_\_\_\_

Date \_\_\_\_\_

(Plant Manager)

Date \_\_\_\_\_

(Director of Manufacturing)

Date \_\_\_\_\_

(Division Controller)

(Plant Controller)

842899481

842899482

## TRANSMISSION CONFIRMATION REPORT No.=010274

DATE/TIME	APR 4, 1991 3:57PM
DURATION	1m 29s
TRANSMITTER	REICHOLD NEWARK BR. #8 2018273 2898
RECEIVER	RCI RALEIGH NC ABBR) *17 REICHOLD CHEM RTP
PAGES XMITTED	02
PAGES ERRORED	
RESULT	OK
COMM. MODE	G3
RESOLUTION	NORMAL

1005502271

REICHHOLD CHEMICALS / NEWARK PLANT-SK

400 DOREMUS AVENUE

NEWARK, NJ 07105

TRANSMIT TO: DAVID BRIGHT

LOCATION: RTP

PHONE NUMBER: \_\_\_\_\_

NUMBER OF PAGES (INCLUDING COVER SHEET): 2

FROM: ART DIEFFENBACH

EXTENSION: \_\_\_\_\_

THIS FACSIMILE IS BEING TRANSMITTED FROM A SHARP FO-420, TELEPHONE  
NUMBER: 201-817-9173. IF THERE ARE ANY PROBLEMS WITH THIS TRANS-  
MISSION, PLEASE CALL 201-589-3709. THANK YOU!!!

842899483



4/4/91

D BRIGHT

## ESTIMATED CLEANUP COSTS FOR SPILLS

MON 4/1/91	- VAC TRUCK, SUPV, OPER, LABORERS & MISC EQ PT	2365 <sup>00</sup>
TUES 4/2/91	<del>SEEN</del>	2400
WED 4/3/91	SECOND VAC TRUCK ADDED - WED AFTERNOON	2918
THURS 4/4/91	TWO VAC TRUCKS	3964
FRI 4/5/91		3964
MON 4/8/91	ONE VAC TRUCK	2100
TUES 4/9/91	NO VAC TRUCK	1800
WED	"	1800
THURS	"	1800
FRI	"	1800
TOTAL		<del>8</del> 24911

CLEAN VENTURE (WATER CLEANUP)	6000
TANK TRUCK RENTAL (3 WKS)	4500
DISPOSAL - 8,000 GAL @ 50¢	<u>4000</u>
TOTAL	\$39,411 <sup>00</sup>

DAVE

Estimate is based on being able to separate the water, resin, mess and end up with 8000 gal of resin mix that can be disposed of at 50¢/gal for fuel blending. Cost could be significantly higher if water content is higher and/or BTU value is not high enough.

Jest



CAMBRIDGE

Chemical Cleaning, Inc.

ESTABLISHED 1948

P.O. Box 4220, 11 West 21st Street  
Linden, New Jersey 07036  
(201) 862-9363 Fax (201) 862-7818

## DAILY WORK SHEET

No. 3599

Start 7<sup>00</sup>

Date 4/4/91 Thursday

Finish 7:30

P.O.# 147253

TANK CLEANING, REMOVAL & DISPOSAL  
N.J. STATE LICENSED HAZARDOUS WASTE HAULER  
HIGH PRESSURE WATER CLEANING

CUSTOMER: BILL TO:

Reichold Chemical

Doremus Ave

Newark N.J.

(201) 589-3709

WORK DESCRIPTION:

Do Necessary Vassing And Cleaning Of Spill On Ground  
At Reichold Chemical Doremus Ave In Newark.

WORK INSTRUCTIONS:

EMPLOYEE NAME	CLASS	HOURS		RATES			AMOUNT
		ST	OT	STRAIGHT	X1.5	X2	
J. Chauca	Laborer	8	4				
D. Chapman	Laborer	8	0				
E. Abbondante	Laborer	8	4				
J. Rudnicki	Laborer	8	0				
D. CHAPMAN	Laborer						
				TOTAL LABOR ➡			

EQUIPMENT	HOURS	RATE	AMOUNT	MATERIAL	QTY.	UNIT PRICE	AMOUNT
<del>#2 Pick-Up</del>	<del>8</del>						
#4 Pick-Up	12						
EQUIPMENT TOTAL ➡				MATERIAL TOTAL ➡			

COMMENTS:

TOTAL ➡

Customer Approved

*[Signature]*

4. CUSTOMER COPY

842899485

P.O. Box 4220, 11 West 21st Street  
Linden, New Jersey 07036  
(201) 862-9363 Fax (201) 862-7818

**DAILY WORK SHEET**

No. 3598

Start 7<sup>00</sup>

Date 4/4/91 Thursday

Finish 7:30

P.O.# 147253

**TANK CLEANING, REMOVAL & DISPOSAL  
N.J. STATE LICENSED HAZARDOUS WASTE HAULER  
HIGH PRESSURE WATER CLEANING**

CUSTOMER: BILL TO:

Reichold Chemical

Doremus Ave

Newark N.J.

(201) 589-3709

WORK DESCRIPTION:

Do Necessary Vaccuming And Cleaning Of Spill On Ground  
At Reichold Chemical Doremus Ave In Newark.

WORK INSTRUCTIONS:

EMPLOYEE NAME	CLASS	HOURS		RATES			AMOUNT
		ST	OT	STRAIGHT	X1.5	X2	
J. Sofran	Super.	8	4				
M. Glogowski	Oper.	4	0				
<del>S. Hooper</del>	<del>Laborer</del>						
Bosze	Oper.	8	4				
C. Cromwell	Laborer	8	4				
<del>D. Chapman</del>	<del>Laborer</del>						
				TOTAL LABOR ➡			

EQUIPMENT	HOURS	RATE	AMOUNT	MATERIAL	QTY.	UNIT PRICE	AMOUNT
36 Vac Truck	12			Truck Suits	6		
31 Vac Truck	12			Rain Suits	4		
				Gloves	6		
				Brushing 1 Box Canine	1 Box		
EQUIPMENT TOTAL ➡				MATERIAL TOTAL ➡			

COMMENTS:

TOTAL ➡

Customer Approved *[Signature]*

4/4/91

BRIGHT

## ESTIMATED CLEANUP COSTS

MON 4/1/91

① VAC TRUCK	1 X 11 HRS	@ 40	440 <sup>00</sup>
② SUPERVISOR	1 X 11 HRS	@ 35	455
③ OPERATOR	1 X 11 HRS	@ 30	390
④ LABORERS	1 X 11 HRS	@ 24	312
	1 X 7 HRS		168
	2 X 5 HRS (4 HR 1 1/2)		336
⑤ PICKUP TRUCK	11 HRS	@ 10	110
⑥ RUBBER SUITS	4	@ 20	80
⑦ TYVEK	4	@ 10	40
⑧ AIR CARTRIDGE	4	@ 4	16
⑨ GLOVES	6	@ 3	18
			<hr/> 2365 <sup>00</sup>

TUES 4/2/91

① VAC TRUCK	1 X 12 HRS	@ 40	480 <sup>00</sup>
② SUPV.	1 X 12	@ 35	490
③ OPER.	1 X 4	@ 30	120 <sup>00</sup>
④ LABOR	3 X 12	@ 24	1008 <sup>00</sup>
⑤ PICKUP TRUCK	1 X 12	@ 10	120
⑥ RUB SUITS	4	20	80
⑦ TYVEK	4	10	40
⑧ GLOVES	5	3	15
⑨ BOOTS	5	8	46
			<hr/> 2366 <sup>00</sup>

WED 4/3/91

① VAC TRUCK	1 X 12	480
	1 X 5	200
② SUPV	1 X 12	490
③ OPER	1 X 12	420
	1 X 5 (4 OT)	210
④ LABOR	2 X 12	672
	1 X 5 (OT)	168
⑤ PICKUP	1 X 12	120
⑥ RUB SUITS	4	80

⑦ TYVEK	6	60
⑧ RUB GLOVES	6	18
		<u>2918<sup>00</sup></u>

THURS &amp; FRI 4/4/91

① VAC TRUCKS	2 X 12	960 <sup>00</sup>	960 <sup>00</sup>
② SUP V	1 X 12	490 <sup>00</sup>	490 <sup>00</sup>
③ OPER	2 X 12	840	840
④ LABOR	<del>4</del> X 12	1344	1344
⑤ PICKUP	1 X 12	120	120
⑥ RUB SUITS	5	100	100
⑦ TYVEK	6	60	60
⑧ GLOVES	6	18	18
⑨ BOOTS	4	<u>32</u>	<u>32</u>
		3964	3964

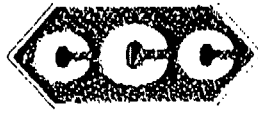
MON 4/8/91 ~~THRU FRI~~

VAC TRUCK	1 X 8	320
SUP V	1 X 8	280
OPER	1 X 8	240
LAB	5 X 8	960
PICKUP	1 X 8	80
SUITS	5	100
TYVEK	6	60
GLOVES	6	18
BOOTS	5	<u>40</u>
		2098 <sup>00</sup>

TUE THRU FRI (ABOVE LESS VAC TRUCK

TUES	1778 <sup>00</sup>
WED	1778 <sup>00</sup>
THURS	1778 <sup>00</sup>
FRI	1778 <sup>00</sup>

TOTAL	\$ 24,787
CLEAN VENTURE (APPROX)	6,000
	<u>\$ 30,787</u>
T/W 75/10 X 3	4450
DISPOSE	<u>4000</u>
	39,237



# CAMBRIDGE Chemical Cleaning, Inc.

ESTABLISHED 1948

P.O. Box 4220  
11 West 21st Street  
Linden, New Jersey  
07036

(908) 862-9363  
FAX: (908) 862-7818

Apr 4, 1991

**CUSTOMER:** REICHHOLD CHEMICALS INC.  
390 DOREMUS AVE.  
NEWARK, N.J. 07105

PHONE: (908) 589-3709  
FAX: (908) 817-9773

ATTENTION: ART DIEFFENBACH

## TIME AND MATERIAL RATES NON UNION AFFILIATED

<u>PERSONNEL</u>	<u>HOURLY RATE (STRAIGHT TIME)</u>
ENVIRONMENTAL CONSULTANT (N.J. PROFESSIONAL ENGINEER)	\$75.00/HOUR (4 HOUR MIN.)
PROJECT MANAGER	\$45.00/HOUR (4 HOUR MIN.)
FOREMAN/SUPERVISOR	\$35.00/HOUR (4 HOUR MIN.)
DRIVER/OPERATOR	\$30.00/HOUR (4 HOUR MIN.)
LABORER/JETTER	\$24.00/HOUR (4 HOUR MIN.)

## OVERTIME RATE GUIDE

TIME AND ONE HALF FOR ALL HOURS WORKED PRIOR TO 8:00 AM  
AND AFTER 4:00 PM ON WEEKDAYS

TIME AND ONE HALF FOR ALL HOURS WORKED ON SATURDAYS

DOUBLE TIME FOR ALL HOURS WORKED ON SUNDAYS AND HOLIDAYS.

## HOLIDAYS

NEW YEAR'S DAY  
WASHINGTON'S BIRTHDAY  
GOOD FRIDAY  
MEMORIAL DAY  
INDEPENDENCE DAY

LABOR DAY  
COLUMBUS DAY  
ELECTION DAY  
VETERAN'S DAY  
THANKSGIVING DAY  
CHRISTMAS DAY

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CAMBRIDGE  
Chemical Cleaning, Inc.  
Linden, New Jersey

REICHHOLD CHEMICALS INC.  
390 DOREMUS AVE.  
NEWARK, N.J.

Apr 4, 1991

EQUIPMENT RATES

VACUUM TRUCKS: 3,500 GAL. CAP.	\$ 40.00/HR (4 HR MIN)
VACUUM TRAILERS: 5,000 GAL. CAP.	\$ 60.00/HR (4 HR MIN)
HIGH PRESSURE WATER BLASTER	
(40 GPM @ 5,000 PSI)	\$ 75.00/HR (4 HR MIN)
(40 GPM @ 10,000 PSI)	\$125.00/HR (4 HR MIN)
SUPER-VAC/SEWER CLEANER	\$ 70.00/HR (4 HR MIN)
(16 CU YD CAPACITY 8000 CFM)	
(FOR SAFETY REASONS AN OPERATOR AND LABORER ARE REQUIRED)	
CHEMICAL CIRCULATING TRAILER	\$ 72.00/HR (4 HR MIN)
UTILITY TRAILER	\$ 72.00/HR (4 HR MIN)
HITACHI EX220LC EXCAVATOR	\$100.00/HR (8 HR MIN)
MOBILIZATION FOR ABOVE	\$500.00/JOB
JOHN DEERE 410A BACKHOE	\$ 75.00/HR (8 HR MIN)
JOHN DEERE 450 FRONT END LOADER	\$ 75.00/HR (8 HR MIN)
MOBILIZATION FOR ABOVE	\$300.00/JOB
TRACTOR/FONTAINE TRAILER	\$ 50.00/HR (4 HR MIN)
DUMP TRUCK	\$ 30.00/HR (4 HR MIN)
RACK TRUCK W/LIFT GATE	\$ 30.00/HR (4 HR MIN)
BOX TRUCK 20' W/LIFT GATE	\$ 30.00/HR (4 HR MIN)
PICK UP TRUCK	\$ 10.00/HR (4 HR MIN)
ROLL OFF TRUCK	\$ 35.00/HR (4 HR MIN)
(CONTAINER RATES ON REQUEST)	
GAMA JET TANK CLEANING MACHINE	\$ 25.00/HR (8 HR MIN)
JACKHAMMER	\$ 12.50/HR (8 HR MIN)
AIR COMPRESSOR - 160 CFM	\$ 18.75/HR (8 HR MIN)
- 750 CFM	\$ 37.50/HR (8 HR MIN)
CHEMICAL AIR PUMP	\$ 20.00/HR (8 HR MIN)

LABOR IS NOT INCLUDED IN THE ABOVE RATES

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**CAMBRIDGE**  
Chemical Cleaning, Inc.  
Linden, New Jersey

REICHOLD CHEMICALS INC..  
390 DOREMUS AVE.  
NEWARK, N.J.

Apr 4, 1991

MISCELLANEOUS RATES

PERSONAL PROTECTIVE EQUIPMENT:

SCOTT AIR PACKS	\$ 25.00/HR (8 HR MIN)
AIR BOTTLE REFILLS	\$ 25.00 EACH
FRESH AIR SYSTEM WITH MANIFOLDS, TANKS, HOSES AND MASKS	\$ 25.00/HR (8 HR MIN)
AIR BOTTLES REFILLS FOR ABOVE	\$ 50.00 EACH
TYVEK COVERALLS	\$ 10.00/PAIR
SARANEX COATED TYVEK COVERALLS	\$ 25.00/PAIR
PVC GLOVES	\$ 3.00/PAIR
RUBBER BOOTS	\$ 8.00/PAIR
RUBBER HIP BOOTS/STEEL TOE	\$ 80.00/PAIR

MATERIALS:

ABSORBENT PADS	\$125.00/BAG
ABSORBENT BOOM (4) REGULAR	\$150.00/BAG
(4) LARGE	\$230.00/BAG
ABSORBENT PARTICULATE	\$150.00/BAG
SPEEDY DRY ABSORBENT	\$ 8.00/BAG
EMERGENCY FENCING	\$ 2.50/FT.
55 GALLON DRUMS (DOT APPROVED 17-H/17-E)	\$ 35.00/EACH
PLASTIC SHEETING (6 MIL) 20' X 100'ROLL	\$ 80.00
MISCELLANEOUS SUPPLIES	COST + 15%

PRICES ABOVE ARE SUBJECT TO CHANGE WITHOUT PRIOR NOTICE.

842899491



CAMBRIDGE  
Chemical Cleaning, Inc.  
Linden, New Jersey

REICHOLD CHEMICALS INC.  
390 DOREMUS AVE.  
NEWARK, N.J.

Apr 4, 1991

DISPOSAL COSTS

DISPOSAL COSTS VARY ON A JOB TO JOB BASIS DEPENDING ON THE TYPE OF MATERIAL, AMOUNT OF SUSPENDED SOLIDS, PERCENTAGE OF CHLORIDES, FLASH POINT AND THE DISPOSAL FACILITY ACCEPTING THE WASTE. BELOW IS A RANGE OF COSTS THAT WE HAVE EXPERIENCED IN THE PAST.

LIQUID WASTE (COST/GALLON)

FLAMMABLE.....\$0.75 TO \$1.75 (GASOLINE AND WATER)  
COMBUSTIBLE.....\$0.55 TO \$1.25 (OIL AND WATER)

SOLID WASTE (COST/55 GAL. DRUM)

FLAMMABLE.....\$235.00 TO \$350.00 (GASOLINE AND WATER)  
COMBUSTIBLE.....\$155.00 TO \$225.00 (OIL AND WATER)

N.J.D.E.P. HAZARDOUS WASTE MANIFEST \$25.00

CAMBRIDGE IS A N.J. LICENCED HAZARDOUS WASTE TRANSPORTER. IT IS THE CUSTOMER'S RESPONSIBILITY TO SUPPLY CAMBRIDGE WITH A PROPER EPA NUMBER. IF THE GENERATOR DOES NOT ALREADY HAVE A PROPER EPA NUMBER, THEY CAN OBTAIN ONE BY CONTACTING ONE OF THE FOLLOWING.

FOR NEW JERSEY WASTE CODES (WASTE CODES STARTING WITH X OR C AND ARE LISTED IN N.J.A.C. 7:26-8.13 AND 8.16)  
CONTACT:

N.J.D.E.P.  
DIVISION OF HAZARDOUS WASTE MANAGEMENT  
401 EAST STATE STREET  
CN028  
TRENTON, N.J.  
ATTN: MS. JEANNE DENES  
(609) 633-1408

FOR RCRA HAZ WASTE CODES CONTACT:

PERMIT ADMINISTRATION BRANCH  
U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)  
26 FEDERAL PLAZA  
NEW YORK, N.Y. 10278  
(212) 264-9880

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CAMBRIDGE  
Chemical Cleaning, Inc.  
Linden, New Jersey

REICHOLD CHEMICALS INC.  
390 DOREMUS AVE.  
NEWARK, N.J.

Apr 4, 1991

**GENERAL CONDITIONS:**

1. EMERGENCY SPILL RESPONSE SPILL RESPONSE AND CLEANUPS CAN SOMETIMES BE COSTLY AND EXTENSIVE. AFTER ASSESSMENT OF THE EXTENT OF WORK TO BE PERFORMED, A DEPOSIT IS REQUIRED BASED ON ESTIMATED COST AND THE AMOUNT OF THE DEPOSIT WILL BE DETERMINED ON THE PAYMENT HISTORY OF THE CUSTOMER INVOLVED.
2. ANY EQUIPMENT DISPATCH OUTSIDE OF NORMAL WORK HOURS WILL INCUR A MINIMUM DISPATCHING FEE.
3. ALL LABOR AND EQUIPMENT SERVICES ARE INVOICED ON A PORTAL TO PORTAL BASIS.
4. IF CAMBRIDGE IS REQUIRED TO EMPLOY ANY SUB CONTRACTORS, THEIR COST WILL BE INVOICED AT COST PLUS 15%
5. ALL WORK PERFORMED OUT OF STATE OR WORK PERFORMED OUTSIDE OF MORE THAN A 75 MILE RADIUS FROM LINDEN, N.J., WHICH REQUIRES EMPLOYEES TO STAY ON SITE FOR MORE THAN ONE DAY WILL INCUR A PER DIEM CHARGE AT THE RATE OF \$125.00 PER MAN PER DAY. TRAVEL TIME WILL BE CHARGED FOR MOBILIZATION AND DEMOBILIZATION.
6. ALL HIGHWAY, BRIDGE OR TUNNEL TOLLS WILL BE CHARGE AT ACTUAL COST IF APPLICABLE.

**TERMS ARE: 2% 10 DAYS - NET 30 DAYS**

1. 7% NEW JERSEY SALES TAX IF APPLICABLE (IF PROJECT IS EXEMPT, A CERTIFICATE MUST BE ISSUED PRIOR TO COMMENCEMENT OF JOB.)
2. ALL INVOICES WILL INCLUDE A 4.5% INSURANCE SURCHARGE.
3. INTEREST WILL BE CHARGED AT A RATE OF 1.5% PER MONTH ON ANY UNPAID BALANCE OVER 30 DAYS OLD.
4. IF ANY AMOUNT PURSUANT TO CHARGES INCURRED THROUGH SERVICES RENDERED IS REFERRED TO AN ATTORNEY FOR COLLECTION, THE CUSTOMER AGREES TO PAY COSTS, EXPENSES AND REASONABLE ATTORNEY'S FEES INCURRED IN COLLECTING ANY UNPAID AMOUNT.

**ACCEPTANCE:** THE ABOVE PRICES, CONDITIONS AND TERMS ARE SATISFACTORY AND ARE HEREBY ACCEPTED. PAYMENT WILL BE MADE AS OUTLINED ABOVE. YOU ARE AUTHORIZED TO PROCEED WITH WORK.

.....  
AUTHORIZED SIGNATURE

.....  
DATE

.....  
TYPED/PRINTED NAME OF AUTHORIZED SIGNATURE

842899493

**CCC CAMBRIDGE**  
Chemical Cleaning, Inc.

ESTABLISHED 1948

P.O. Box 4220, 11 West 21st Street  
Linden, New Jersey 07036  
(201) 862-9363 Fax (201) 862-7818

**DAILY WORK SHEET**

No. 3565

Start 9:00

Date 4/1/91 Monday

Finish 8:30

P.O.# 147253

**TANK CLEANING, REMOVAL & DISPOSAL  
N.J. STATE LICENSED HAZARDOUS WASTE HAULER  
HIGH PRESSURE WATER CLEANING**

CUSTOMER: BILL TO:

Riechold Chemical

Doremus Ave

Newark N.J.

(201) 589-3709

WORK DESCRIPTION:

Do Necessary Vassing Of Spill At Reichold Chemical  
Doremus Ave In Newark, N.J.

WORK INSTRUCTIONS:

EMPLOYEE NAME	CLASS	HOURS		RATES			AMOUNT
		ST	OT	STRAIGHT	X1.5	X2	
P. Pagan 9-	Oper.	7	4				
S. rudnicki 9-	Laborer	7	4				
M. Kraft Jr. 9-4:00	Laborer	7	0				
Sofran 9	Super	7	4				
M. GLOGOWSKI 3-	Lab.	1	4				
J. Boore 3-	Lab.	1	4				
				TOTAL LABOR ➡			

EQUIPMENT	HOURS	RATE	AMOUNT	MATERIAL	QTY.	UNIT PRICE	AMOUNT
31 Vac Truck				Robben Suits	4		
#1 Pick-Up				Truck	4		
				Air Cantrige	4		
				Gloves	6		
EQUIPMENT TOTAL ➡				MATERIAL TOTAL ➡			

COMMENTS:

TOTAL ➡

Customer Approved *X*

**CCC CAMBRIDGE**  
Chemical Cleaning, Inc.

ESTABLISHED 1948

P.O. Box 4220, 11 West 21st Street  
Linden, New Jersey 07036  
(201) 862-9363 Fax (201) 862-7818

**DAILY WORK SHEET**

No. **3573**

Start **7<sup>00</sup>**

Date **4/2/91 Tuesday**

Finish **7:30**

P.O.# **147253**

**TANK CLEANING, REMOVAL & DISPOSAL  
N.J. STATE LICENSED HAZARDOUS WASTE HAULER  
HIGH PRESSURE WATER CLEANING**

CUSTOMER: BILL TO:

**Reichold Chemical**

**Doremus Ave**

**Newark, N.J.**

**(201) 589-3709**

WORK DESCRIPTION:

**Do Necessary Vaccuming And Cleaning Of Spill At  
Riechold Chemical Doremus Ave In Newark, N.J.**

WORK INSTRUCTIONS:

EMPLOYEE NAME	CLASS	HOURS		RATES			AMOUNT
		ST	OT	STRAIGHT	X1.5	X2	
<b>J. Sofran</b>	<b>Super.</b>	<b>8</b>	<b>4</b>				
<b>P. Pagan</b>	<b>Oper.</b>	<b>4</b>					
<b>R. Dahl</b>	<b>Laborer</b>	<b>8</b>	<b>4</b>				
<b>Rudnicki</b>	<b>Laborer</b>	<b>8</b>	<b>4</b>				
<b>E. Abbondante</b>	<b>Laborer</b>	<b>8</b>	<b>4</b>				

**TOTAL LABOR**

EQUIPMENT	HOURS	RATE	AMOUNT	MATERIAL	QTY.	UNIT PRICE	AMOUNT
<b>31 Vac Truck</b>	<b>12</b>			<b>RAN Gear</b>	<b>4</b>		
<b>#1 Pick-Up</b>	<b>12</b>			<b>Rubber Gloves</b>	<b>4</b>		
				<b>Tyvek</b>	<b>4</b>		
				<b>Boots</b>	<b>2</b>		
<b>EQUIPMENT TOTAL</b>				<b>MATERIAL TOTAL</b>			

COMMENTS: **SPILL MATERIAL PUT IN HOLDING**  
**Tnd. ON SITE**

**TOTAL**

Customer Approved *[Signature]*

P.O. Box 4220, 11 West 21st Street  
Linden, New Jersey 07036  
(201) 862-9363 Fax (201) 862-7818

# DAILY WORK SHEET

No. 3589

Start 7<sup>00</sup>

Date 4/3/91 Weds

Finish

P.O.# 147253

## TANK CLEANING, REMOVAL & DISPOSAL N.J. STATE LICENSED HAZARDOUS WASTE HAULER HIGH PRESSURE WATER CLEANING

CUSTOMER: BILL TO:

Reichold Chemical

Doremus Ave

Newark N.J.

(201) 589-3709

WORK DESCRIPTION:

Do Necessary Vaccuming And Cleaning Of Spill From  
Ground At Reichold Chemical Doremus Ave Newark N.J.

WORK INSTRUCTIONS:

EMPLOYEE NAME	CLASS	HOURS		RATES			AMOUNT
		ST	OT	STRAIGHT	X1.5	X2	
S.Rudnicki	Laborer	8	4				
M. GLOBOWSKI	Oper.	8	4				
<del>T. Richardson</del>	<del>Laborer</del>	8	4				
M. KRAFT JR.	Laborer	8	0				
<del>E. Abbondante</del>							
Sofran	Super	8	4				
E. Abbondante		8	4				
J. BOOZE		1	4				
T. Richardson		1	4				
				TOTAL LABOR ➡			

EQUIPMENT	HOURS	RATE	AMOUNT	MATERIAL	QTY.	UNIT PRICE	AMOUNT
31 Vac Truck	12			1 Rubber Suit	4		
#1 Pick-Up	12			1 Tyvek	6		
36 VAC Truck	5			1 Rubber Gloves	6		
EQUIPMENT TOTAL ➡				MATERIAL TOTAL ➡			

COMMENTS:

TOTAL ➡

Customer Approved

T-27

@ 7<sup>30</sup> AM    5' 6"  
@ 11<sup>30</sup> AM    4' 10"  
LOSS            0' 8" / 4 HRS

THURS    7' 1"    TIC ROD  
             5' 6"    7<sup>30</sup> AM  
             1' 7"    LOST = 19"

APPROX TIME - 9 HRS

APPROX VALVE OPEN

10 PM to 11 PM SUN 3/31/97

LOST 27" X 54 GAL/INCH = 1458 GALS

**EAST COAST STAINLESS & ALLOYS INC.**

1000 BLAIR ROAD  
CARTERET, N. J. 07008

(201) 381-0999  
FAX 201-855-0019

842899497

Resin Spill in T/F 4/1/91

Approx 2500 GAL AMINO RESIN 98-210 FROM T-14  
SPILLED INTO T/F 4/1/91, DISCOVERED BY MILES THOMPSON  
EARLY AM (4 AM?) 4/1/91. SAMPLE VALVE ON T-14 OPENED,  
WAS CLOSED. SPILL COVERED 2 T/F BAYS. LATER IN  
MORNING APPROX 11 AM IT WAS DISCOVERED THAT  
SAMPLE VALVE ON T-27 (310 VSD) WAS ALSO OPENED  
ALLOWING TANK TO DRAIN IN T/F DIKE. LOST APPROX  
1458 GAL RESIN. BOTH VALVES APPEARED TO BE DELIBERATELY  
OPENED. CAMBRIDGE WAS CALLED FOR CLEANUP. CONTACTED  
RTP (V WILL) TO DETERMINE REPORTABILITY OF SPILL. <sup>SHE</sup> RETURNED  
CALL & FAX TO US THAT SPILL WAS REPORTABLE DUE TO R&B XYWL  
PRESENT. R NEUTALIS CALLED NAT. RESP & DEP. TO REPORT.  
DEP, NWK HAZ MAT, LEPC (BOB SWALES) ARRIVED @ 12<sup>45</sup>.  
DEP (CHRIS GIBBONS). AED TOOK THEM TO SITE. THEY SPOKE TO  
ME, R NEUTALIS, CAMBRIDGE CLEANUP SUPERVISOR (J SOFRAN) &  
WERE SATISFIED THAT SPILL WAS WELL CONTROLLED & CLEANUP WAS  
BEING HANDLED SATISFACTORILY. THEY LEFT - DEP (CHRIS GIBBONS)  
RETURNED A FEW MINUTES LATER WITH A NOTICE OF VIOLATION

THAT HE WAS TOLD TO ISSUE BY HIS SUPERVISOR FOR DELAY  
IN REPORTING SPILL, GAVE THE VIOLATION TO BOB NEUTALIS FOR RESPONSE  
WITHIN 7 DAYS., CAMBRIDGE WORKED UNTIL 8PM 4/1/91 RETURNED  
@ 8AM 4/2/91 TO CONTINUE CLEANUP. VAC UP SPILL & TRANSFER TO  
T/W OBTAINED BY GASPARIK.

I MET WITH DAY SHIFT & AFTERNOON SHIFT 4/1/91 @ 3<sup>30</sup>PM  
IN LUNCH ROOM & LECTURED THEM ON STUPIDITY OF THIS ACT OF  
SABOTAGE. PLAN TO MEET W/ OTHER TWO SHIFTS WED AM 4/3/91  
7<sup>30</sup> AM.

IT WAS ALSO DETERMINED THAT SOMEONE HAD LEFT OPEN  
SAMPLE VALVE ON TT44 SAME NITE BUT IT WAS DISCOVERED BY  
PERSON WORKING IN AREA & CLOSED BEFORE MAJOR PROBLEM  
OCCURRED. DISCOVERED WHILE PUMPING R1 TO TT44. LOSS  
APPROX 10-15 GALLONS ACCORDING TO C DRIVER.

V. WILL INDICATED DURING EARLY CONVERSATION THAT  
SITE DID NOT THINK IT HAD TO BE REPORTED TO DEP UNLESS  
R2 WAS INVOLVED, BECAUSE DEP REGULATION HAD CHANGED FROM  
REPORTING ALL SPILLS. TALKED TO DEP (CHRIS GIBBONS) WHILE HE  
WAS HERE & WAS TOLD THAT ALL SPILLS STILL MUST BE



REPORTED. CHANGE IN REGULATION IS ONLY PROPOSED, NOT  
APPROVED AS YET. THIS WAS LATER CONFIRMED BY V WILL  
IN LATER PHONE CONVERSATION

PLAN TO CONTINUE CLEANUP UNTIL COMPLETE.

Art Duffenbach



07004

## MATERIAL SAFETY DATA SHEET

EASTMAN CHEMICAL PRODUCTS, INC.  
EASTMAN KODAK COMPANY  
Kingsport, Tennessee 37662

For Health Hazard Information, Call: (615) 229-6094

For Other Information, Call Your Eastman Representative

Eastman Operator: (615) 229-2000

Date of Preparation: 05-31-89

-----  
SECTION I. IDENTIFICATION

-- Name:

n-Butyl Alcohol

-- Synonyms: PM 42, PM 10308; Butanol

-- Formula:  $\text{CH}_3\text{CH}_2\text{CH}_2\text{CH}_2\text{OH}$

-- Molecular Weight: 74.12  
-----

## SECTION II. COMPONENT AND PRECAUTIONARY DATA

A. PRINCIPAL COMPONENT:	Approx Weight %	CAS Reg No	Eastman Kodak No
n-Butyl alcohol* **	100	71-36-3	900050

See Section VI-A for information on exposure limits.

\*Hazardous material as defined by OSHA, 29 CFR 1910.1200.

\*\*Chemical subject to the reporting requirements of section 313 of  
Title III of the Superfund Amendments and Reauthorization Act of 1986  
and 40 CFR Part 372.

## B. PRECAUTIONARY LABEL STATEMENTS:

WARNING! FLAMMABLE LIQUID AND VAPOR  
CAUSES EYE IRRITATION  
HIGH VAPOR CONCENTRATIONS MAY CAUSE DROWSINESS

Keep away from heat, sparks, and flame.  
Avoid contact with eyes.  
Avoid breathing vapor or mist.  
Keep container closed.  
Use with adequate ventilation.  
Wash thoroughly after handling.

FIRST AID: In case of contact, immediately flush eyes with plenty of water

IN CASE OF FIRE: Use water spray, dry chemical, "alcohol" foam, or  $\text{CO}_2$ .  
Use water spray to keep fire-exposed containers cool. Water may be  
ineffective in fighting the fire.

IN CASE OF SPILL: Eliminate all ignition sources. Use water spray to disperse vapors and to dilute spill to a nonflammable mixture. Use water spray to protect personnel attempting to stop the leak. Prevent runoff from entering drains, sewers, and streams.

Since emptied containers retain product residue, follow label warnings even after container is emptied. Do not cut, drill, grind, or weld on or near this container.

FOR MANUFACTURING USE ONLY

-----  
SECTION III. PHYSICAL DATA (1)

- Appearance and Odor: Colorless liquid; odor similar to fusel oil.
- Boiling Point: 117°C (243°F).
- Melting Point: -89°C (-128°F).
- Specific Gravity (H<sub>2</sub>O = 1): 0.811.
- Vapor Pressure: 5.5 mm Hg at 20°C.
- Volatile Fraction by Weight: 1.0.
- Vapor Density (Air = 1): 2.6.
- Evaporation Rate (n-Butyl acetate = 1): 0.5.
- Solubility in Water: 7.9%; moderate.

-----  
SECTION IV. FIRE AND EXPLOSION HAZARD DATA (1)

- Flash Point: 36°C (97°F); Method Used: Tag Closed Cup.
- Autoignition Temperature: 355°C (670°F); Method Used: ASTM D-2155.
- Flammable Limits: LEL 1.73% (at 54°C [129°F]).  
UEL 10.7% (at 94°C [201°F]).
- Electrical resistivity: 1.5 x 10<sup>10</sup> Ohm-cm.
- Extinguishing Agent: Water spray, dry chemical, "alcohol" foam, or CO<sub>2</sub>.
- Special Fire-Fighting Procedures: Wear self-contained breathing apparatus and protective clothing to prevent contact with skin and eyes. Use water spray to keep fire-exposed containers cool. Water may be ineffective in fighting fire.
- Unusual Fire and Explosion Hazards: Flammable liquid and vapor. (See Section VIII.) Vapors are heavier than air and may travel considerable distance to a source of ignition and flash back.

-----  
SECTION V. REACTIVITY DATA

- Stability: Stable.
- Incompatibility: Oxidizing materials can cause a vigorous reaction.
- Hazardous Decomposition Products: As with any other organic material, combustion will produce carbon dioxide and probably carbon monoxide.
- Hazardous Polymerization: Will not occur.

-----  
SECTION VI. TOXICITY AND HEALTH

A. EXPOSURE LIMITS

- Threshold Limit Value (TLV): 50 ppm-C, "Skin Notation", ACGIH, 1988-1989.
- OSHA Permissible Exposure Limit (PEL): 50 ppm-C, "Skin Designation".
- A NIOSH industrial hygiene analytical method is available. (2)

## B. EXPOSURE EFFECTS

Inhalation: High vapor concentrations may cause drowsiness.

Eyes: Liquid and vapor cause irritation.

Skin: Prolonged or repeated contact may cause irritation.

## C. FIRST AID

Eyes: Immediately flush with plenty of water for at least 15 min. Get medical attention.

## D. TOXICITY DATA

Test	Species	Result	Acute Toxicity Classification (3)
Acute oral LD <sub>50</sub>	Rat	2.5 g/kg (4)	Slightly toxic
Acute oral LD <sub>50</sub>	Rat	4.36 g/kg (4)	Slightly toxic
Acute oral LD <sub>50</sub>	Rabbit	3.4 g/kg (4)	
Inhalation LC <sub>50</sub>	Rat	>8000 ppm/4 h (4)	Slightly toxic
Inhalation LC <sub>50</sub>	Rat	>8520 ppm/6 h (5)	
Dermal LD <sub>50</sub>	Rabbit	5.3 g/kg (4)	Practically nontoxic
Skin irritation	Rabbit	Slight (6)	
Eye irritation	Rabbit	Strong (7)	

Signs of toxicity in animals exposed to airborne n-butyl alcohol include mucous membrane irritation, restlessness, ataxia, prostration and narcosis. Dermal applications to rabbits of 42 to 55 mL/kg/day for 1 to 4 consecutive days caused death in all the animals. (4)

Guinea pigs exposed to 100 ppm n-butyl alcohol 4 h/day for 64 days (1 day/wk omitted) showed weight gain, a decrease in the number of red blood cells, and a relative and absolute lymphocytosis. (8) Mice exposed repeatedly to an airborne concentration of 8000 ppm for a total of 130 h showed narcosis and reversible fatty liver change; however, the mice gained weight and none died. Rabbits survived exposure by dermal applications of 20 mL/kg/day of the compound for 30 days over a 6-wk period. (4)

Workers exposed to airborne concentrations  $\geq 200$  ppm occasionally developed increasing corneal inflammation associated with burning sensation, blurred vision, tearing, photophobia, and slight to moderate corneal edema and mild conjunctival edema. In each case the conditions subsided over the weekend. At 100 ppm complaints of irritation were rare. (4)

---

SECTION VII. VENTILATION AND PERSONAL PROTECTION

## A. VENTILATION

Good general ventilation (typically 10 air changes per hour) should be used. Ventilation rates should be matched to conditions. Local exhaust ventilation or an enclosed handling system may be needed to control airborne levels below recommended exposure limits (see Section VI-A).

## B. RESPIRATORY PROTECTION

An appropriate NIOSH-approved respirator for organic vapor must be worn if exposure is likely to exceed recommended exposure limits (see Section VI-A). If respirators are used, a program should be established to assure compliance with OSHA Standard 29 CFR 1910.134.

## C. SKIN AND EYE PROTECTION

Wear safety glasses with side shields (or goggles). A face shield is recommended. For operations where prolonged or repeated skin contact may occur, impervious gloves are recommended. A safety shower, an eye bath, and washing facilities should be available. Wash thoroughly after handling.

---

## SECTION VIII. SPECIAL STORAGE AND HANDLING PRECAUTIONS

Material is classified as a flammable liquid. Keep away from heat, sparks, and flame. Keep container closed. Use with adequate ventilation. Comply with all federal, state, and local codes pertaining to the storage, handling, dispensing, and disposal of flammable liquids. Since emptied containers retain product residue, follow label warnings even after container is emptied. Do not cut, drill, grind, or weld on or near this container.

---

## SECTION IX. SPILL, LEAK, AND DISPOSAL PRACTICES

Steps to be Taken in Case Material is Released or Spilled: Eliminate all ignition sources. Small spills may be collected with absorbent materials. For large spills, use water spray to disperse vapors and to dilute spill to a nonflammable mixture. Prevent runoff from entering drains, sewers, or streams. Superfund reportable quantity (RQ): 5000 lbs.

Waste Disposal Method: Incineration. Observe all federal, state, and local laws concerning health and environment.

---

## SECTION X. ENVIRONMENTAL EFFECTS DATA

A. SUMMARY: This product has been tested for environmental effects. Some laboratory test data and published data (5, 9-14) are available for this product, and these data have been used to provide the following estimate of environmental impact.

This product has a high biological oxygen demand, and it is expected to cause significant oxygen depletion in aquatic systems. It has a low potential to affect aquatic organisms. It is expected to be readily biodegradable and is not likely to bioconcentrate. If diluted with a large amount of water, this product released into the environment is not expected to have a significant impact.

## B. OXYGEN DEMAND DATA

-- COD: 1.90 g/g (9); 2.46 g/g (10)  
-- BOD<sub>5</sub>: 1.1-2.04 g/g (9); 1.71 g/g (10)  
-- BOD<sub>20</sub>: 1.89 g/g (9)

### C. ACUTE AQUATIC EFFECTS

- 24-h LC<sub>50</sub>; Water flea: 1855 mg/L (11)
- 24-h LC<sub>50</sub>; Creek chub: 1000-1400 mg/L (9)
- 24-h LC<sub>50</sub>; Goldfish: 1900 mg/L (12)
- 48-h LC<sub>50</sub>; Golden orfe (minnow): 1200 mg/L (5); 1770 mg/L (13)\*

\*Results of the same test carried out at two different laboratories.

### D. BIOCONCENTRATION POTENTIAL

- Octanol/water partition coefficient: Log P = 0.32-0.89; P = 2.1-7.8 (14)

---

## SECTION XI. TRANSPORTATION

DOT Hazard Classification: Flammable liquid.

Flashpoint: See Section IV.

Proper DOT Shipping Name: Butyl alcohol.

NA Number: 1120.

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## SECTION XII. REFERENCES

1. File data, Material Safety Program, Eastman Chemicals Division, Eastman Kodak Company, Kingsport, Tennessee.
2. NIOSH MANUAL OF ANALYTICAL METHODS, 3rd Edition. Issued by the National Institute for Occupational Safety and Health. U.S. Government Printing Office, Washington, 1984, Method 1401.
3. AM IND HYG ASSOC Q 10, 93-96 (1949).
4. G. D. Clayton and F. E. Clayton, Editors. PATTY'S INDUSTRIAL HYGIENE AND TOXICOLOGY, 3rd Revised Edition, Volume 2C. Wiley-Interscience, New York, 1982, pp. 4571-4578.
5. Unpublished data, Health and Environment Laboratories, Eastman Kodak Company, Rochester, New York.
6. J. F. Treon, Unpublished data.
7. AMA ARCH IND HYG OCCUP MED 4, 119-122 (1951).
8. F. A. Patty, Editor. INDUSTRIAL HYGIENE AND TOXICOLOGY, 2nd Revised Edition, Volume II. Wiley-Interscience, New York, 1963, p. 1433.
9. K. Verschuere. HANDBOOK OF ENVIRONMENTAL DATA ON ORGANIC CHEMICALS, 2nd Edition. Van Nostrand Reinhold Company, New York, 1983, pp. 136-137.
10. WATER RES 13, 627-630 (1979).
11. Z WASSER ABWASSER FORSCH 15, 1-6 (1982).
12. WATER RES 13, 623-626 (1979).

13. Z WASSER ABWASSER FORSCH 11, 161-164 (1978).

14. A. J. Leo and C. Hansch, Editors. CHEMICAL PARAMETER DATA BASE.  
Medicinal Chemistry Project, Pomona College, Seaver Chemistry Laboratory,  
Claremont, California, June 21, 1985.

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SECTION XIII. HAZARD RATINGS

	Health	Flammability	Reactivity
HMIS* Rating:	2	3	0
NFPA** Rating:	1	3	0

NOTICE: These ratings involve data and interpretations that may vary from company to company and are intended only for rapid, general identification of the magnitude of the specific hazard. TO DEAL ADEQUATELY WITH THE SAFE HANDLING OF THIS MATERIAL, ALL THE INFORMATION CONTAINED IN THIS MSDS MUST BE CONSIDERED. The customer is responsible for determining the proper personal protective equipment needed for its particular use of this material.

\*Hazardous Materials Identification System's [HMIS] Revised RAW MATERIALS RATING MANUAL, National Paint & Coatings Association, Fall 1984.

\*\*NFPA 704 Standard System for the Identification of the Fire Hazards of Materials, National Fire Protection Association, 1985.

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The information contained herein is furnished without warranty of any kind. Users should consider these data only as a supplement to other information gathered by them and must make independent determinations of suitability and completeness of information from all sources to assure proper use and disposal of these materials and the safety and health of employees and customers.

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C/10141A/900050/R-2, S-2, F-3, C-0

# REICHHOLD

## interoffice communication

TO: A. Dieffenbach - Newark

FROM: V. Will *VW*

cc: R. Aston - R.T.P.  
D. Bright - R.T.P.  
M. Gasparik - Newark  
B. Naujelis - Newark

LOCATION: R.T.P.

DATE: April 1, 1991

SUBJECT: Beckamine Spill

The spill of 2500 gallons of Beckamine Synthetic Resin solution into the tank farm at the Doremus Avenue plant needs to be reported, as xylene is present in the spilled mixture in excess of the reportable quantity of 1000 lbs.

The formulation information for 93-210 Beckamine Synthetic Resin Solution shows that the mixture contains the following:

<u>TYPICAL POUNDS/BATCH</u>	<u>RAW MATERIAL</u>	<u>REPORTABLE QUANTITY (lbs)</u>	<u>AMOUNT IN SPILL (lbs)</u>
126 (0.4%)	75% H <sub>3</sub> PO <sub>4</sub>	5000	83 lbs.
650	Hexamethylenetetramine	N/A	-
19280	Butyl formaldehyde	N/A	-
1700	n-Butanol		
5490	Recovered n-Butanol	5000	1772 lbs.
4500 -	n-Butanol recovered	-	-
2560 (8.1%)	Xylenes	1000	1689 lbs.
<u>6200</u>	<u>Urea</u>	<u>-</u>	<u>-</u>

31,506 lbs.

Because the spilled material contains xylene in excess of the reportable quantity, the following two agencies need to be informed:

- 1) NATIONAL RESPONSE CENTER 1-800-424-8802
- 2) NJDEP (609) 292-7172

The spill should be reported, giving the following information:

- o Spill of 2500 gallons of synthetic resin pollution containing ~8% xylene (mixed isomers) - 1689 lbs. Estimated - CAS # 1330 - 20 - 7 into tank farm.
- o Spill is fully contained. Resin solution skins over, so not all xylene contained in mixture is released. To be safe, reporting the release even though it is unknown at this time that 1000 lbs. have been released.

842899507



- o Spill occurred on April 1, 1991; however, the exact time is unknown. It was discovered about 8 a.m. during routine inspection of tank farm area.
- o Situation is not an emergency. Material is being cleaned up by (Name of Company).
- o A written report will be submitted as soon as possible to update this initial report.

Please call if you would like me to make the notification.

**MATERIAL SAFETY DATA SHEET**

(Approved by U.S. Department of Labor "Essentially Similar" to Form OSHA-20)

**Reichhold Chemicals, Inc.**

525 North Broadway, White Plains, N.Y. 10603

INFORMATION  
TELEPHONE NO.: (914) 682-5700REVISION  
DATE: 2/86**REICHHOLD®**  
PERFORMANCE TECHNOLOGY

EMERGENCY PHONE NUMBER •

**800-423-3003 / 800-442-4844**  
(in continental U.S. — except N.Y.) (in N.Y. State)• These numbers are available  
days, nights, weekends, and holidays.**Section I — IDENTIFICATION**

PRODUCT NAME	BECKAMINE <sup>(R)</sup> 93-210	CHEMICAL NAME OR FAMILY	Synthetic Resin Solution
FORMULA	PROPRIETARY	TRADENAME	BECKAMINE <sup>(R)</sup>
DOT SHIPPING NAME	Resin Solution - UN 1866	DOT HAZARD CLASS	Flammable Liquid

**Section II — IMPORTANT COMPONENTS**

62% Resin Solids  
27% Butanol  
11% Xylene  
<3% Formaldehyde

## PERMISSABLE EXPOSURE CONCENTRATION

Not Established  
50 ppm (SKIN) (ACGIH)  
100 ppm (ACGIH)  
1 ppm (ACGIH) [potentially carcinogenic  
for man (NTP & IARC)]

**Section III — PHYSICAL DATA**

BOILING POINT (°F)	243-288	SPECIFIC GRAVITY (H <sub>2</sub> O = 1)	1.04
VAPOR PRESSURE (mm Hg.)	9.5 @ 20°C	PERCENT VOLATILE BY VOLUME (%)	49
VAPOR DENSITY (AIR = 1)	Greater than one	EVAPORATION RATE (Ethyl Ether-1)	Less than one
SOLUBILITY IN WATER	Slightly soluble		
APPEARANCE AND ODOR	Clear liquid, pungent aromatic odor.		

**Section IV — FIRE AND EXPLOSION HAZARD DATA**

FLAMMABILITY CLASSIFICATION	Class 1C	FLASH POINT	95°F (SFCC)	LEL	1.0%
EXTINGUISHING MEDIA	Carbon dioxide, dry chemical, foam.				
UNUSUAL FIRE AND EXPLOSION HAZARDS	Isolate from heat, electrical equipment, sparks and open flames. Closed containers may rupture when exposed to extreme heat.				
SPECIAL FIRE FIGHTING PROCEDURES	Firefighters should wear self-contained breathing apparatus to avoid inhalation of smoke or vapors.				

**Section V — HEALTH HAZARD DATA**

## THRESHOLD LIMIT VALUE

See Section II

## EFFECTS OF OVEREXPOSURE

VAPORS: Irritating to eyes, nose and throat. Excess exposure may result in headache, dizziness and nausea. Defatting to skin.

## EMERGENCY AND FIRST AID PROCEDURES

INHALATION: Provide fresh air and rest. SKIN: Wash affected area with soap and water. INGESTION: DO NOT induce vomiting. Drink one or two glasses of water to dilute. See a physician. EYES: Flush with running water for 15 minutes.

**Section VI — REACTIVITY DATA**STABILITY ☐ UNSTABLE ☒ STABLE

CONDITIONS TO AVOID

Warm storage, ignition sources.

INCOMPATIBILITY (Materials to avoid)

Avoid strong, oxidizing agents.

HAZARDOUS DECOMPOSITION PRODUCTS

Resin solids contain only carbon, hydrogen, nitrogen and oxygen atoms; Thermal and oxidative decomposition produces smoke, fumes and other expected by products.

HAZARDOUS POLYMERIZATION

☐ MAY OCCUR☒ WILL NOT OCCUR

CONDITIONS TO AVOID

**Section VII — SPILL OR LEAK PROCEDURES**

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Ventilate area. Remove all sources of ignition. Spread absorbant material and place in a closed container. Wear protective equipment during cleanup.

WASTE DISPOSAL METHOD

Dispose of in a properly permitted chemical disposal facility in accordance with local, state and federal regulations.

**Section VIII — SPECIAL PROTECTION INFORMATION**

RESPIRATORY PROTECTION

Should be worn to avoid breathing spray mist, heated vapors, or if TLV is exceeded.

VENTILATION

Local exhaust and general ventilation recommended.

PROTECTIVE GLOVES

Chemical resistant plastic or rubber.

EYE PROTECTION

Chemical goggles.

OTHER PROTECTIVE EQUIPMENT

Safety shower. Eye wash fountain.

**Section IX — SPECIAL PRECAUTIONS**

CAUTIONS TO BE TAKEN IN HANDLING AND STORING

Avoid prolonged or repeated inhalation of heated vapors or spray mist. Keep away from heat.

OTHER PRECAUTIONS

Avoid prolonged or repeated skin contact.

# REICHHOLD®

## PURCHASE ORDER

THE EQUAL OPPORTUNITY CLAUSE IN SECTION 202 OF EXECUTIVE ORDER 11246, AS AMENDED, IS INCORPORATED AS PART OF THIS PURCHASE ORDER AND IF APPLICABLE, IS BINDING UPON VENDOR.

DIVISION <b>013 CTRD</b>		RECEIVING POINT	CODE	VENDOR CODE	P/O NO. <b>147267</b>	SEQ#	P.O. DATE <b>4/8/91</b>
COMPLETE ONE OF THESE BOXES. <input type="checkbox"/> PURCHASE ORDER <input type="checkbox"/> SERVICE ORDER <input type="checkbox"/> BLANKET ORDER <input type="checkbox"/> BLANKET RELEASE		DIEFFENBACH TO APPROVE INVOICE 1 - YES 2 - NO	REQUEST NO.	CONFIRMING TELEPHONE ORDER 1 - YES 2 - NO	CERT. OF ANALYSIS REQUIRED 1 - YES 2 - NO	SALES ORDER NO.	TAX % - WHEN EXEMPT SHOW NO. OR TAX AUTHORITY #
SHIP VIA		1 - DESTINATION P.O.B.		2 - SHIP PT.	3 - OTHER CODE (BELOW)	ALLOWABLE OVER %	SHIPMENT UNDER
						TERMS	*ACKNOWLEDGMENT REQUIRED 1 - YES 2 - NO

TO  
**• CLEAN VENTURE INC  
1160 STATE ST  
P O BOX 936  
PERTH AMBOY NJ 08862**

SHIP TO

**REICHHOLD CHEMICALS  
390 DOREMUS AVENUE  
NEWARK NJ 07105**

RESPONS. CODES	ACCOUNT NUMBER	SUB NUMBER	DESCRIPTION	AND	CATALOG NUMBER	COMMODITY CODE	ITEM NO.	QUANTITY	U/M	PRICE	U/M	DISC.
4 3 2 1	4 3 2 1	1 2 3 4 5 6 7 8	FURNISH MATERIALS, LABOR AND EQUIPMENT NECESSARY TO CLEAN UP RESIN SPILL ON WATER			1 2 3 4 5 6 7 8		7 6 5 4 3 2 1	2 1			
			MAIL INVOICE TO: REICHHOLD CHEMICALS 400 DOREMUS AVENUE NEWARK NJ 07105							NOT TO EXCEED \$7000.00		
			INVOICE MUST REFERENCE PURCHASE ORDER NUMBER.									

MEMORANDA:

PLEASE ENTER OUR ORDER IN ACCORDANCE WITH ALL CONDITIONS SHOWN. ADVISE AT ONCE OF ANY CHANGE. ON THE REVERSE SIDE ARE TERMS AND CONDITIONS TO WHICH THE SELLER AGREES BY ACCEPTANCE OF THIS ORDER. PLEASE RETURN ACKNOWLEDGMENT COPY AT ONCE.

DELIVERIES MUST BE MADE BETWEEN 8:00 A.M. AND 3:00 P.M. UNLESS OTHERWISE AUTHORIZED. PURCHASE ORDER NO., RELEASE NO. AND VENDOR NO. MUST APPEAR ON ALL INVOICES, PACKAGES, PACKING SLIPS OR CORRESPONDENCE PERTAINING TO THIS ORDER.

MAIL INVOICE IN TRIPLICATE TO  
SAME AS "SHIP TO" ADDRESS

THE SIGNER OF THE PURCHASE ORDER  
VERIFIES THAT A COPY OF A VALID MSDS

842899511

# MATERIAL SAFETY DATA SHEET

(Approved by U.S. Department of Labor "Essentially Similar" to Form OSHA-20)

Reichhold Chemicals, Inc.

525 North Broadway, White Plains, N.Y. 10603

**REICHHOLD®**

PERFORMANCE TECHNOLOGY

INFORMATION

TELEPHONE NO.: (914) 682-5700

REVISION

DATE: 2/86

EMERGENCY PHONE NUMBER

800-423-3003 / 800-442-4844  
(in continental U.S. — except N.Y.) / (in N.Y. State)

• These numbers are available  
days, nights, weekends, and holidays.

## Section I — IDENTIFICATION

PRODUCT NAME	BECKAMINE <sup>(R)</sup> 93-210	CHEMICAL NAME OR FAMILY	Synthetic Resin Solution
FORMULA	PROPRIETARY	TRADE NAME	BECKAMINE <sup>(R)</sup>
DOT SHIPPING NAME	Resin Solution - UN 1866	DOT HAZARD CLASS	Flammable Liquid

## Section II — IMPORTANT COMPONENTS

62% Resin Solids  
27% Butanol  
11% Xylene  
<3% Formaldehyde

PERMISSABLE EXPOSURE CONCENTRATION

Not Established  
50 ppm (SKIN) (ACGIH)  
100 ppm (ACGIH)  
1 ppm (ACGIH) [potentially carcinogenic  
for man (NTP & IARC)]

## Section III — PHYSICAL DATA

BOILING POINT (°F)	243-288	SPECIFIC GRAVITY (H <sub>2</sub> O = 1)	1.04
VAPOR PRESSURE (mm Hg.)	9.5 @ 20°C	PERCENT VOLATILE BY VOLUME (%)	49
VAPOR DENSITY (AIR = 1)	Greater than one	EVAPORATION RATE (Ethyl Ether-1)	Less than one
SOLUBILITY IN WATER	Slightly soluble		
APPEARANCE AND ODOR	Clear liquid, pungent aromatic odor.		

## Section IV — FIRE AND EXPLOSION HAZARD DATA

FLAMMABILITY CLASSIFICATION	Class 1C	FLASH POINT	95°F (SFCC)	LEL	1.0%
EXTINGUISHING MEDIA	Carbon dioxide, dry chemical, foam.				

UNUSUAL FIRE AND EXPLOSION HAZARDS Isolate from heat, electrical equipment, sparks and open flames. Closed containers may rupture when exposed to extreme heat.

SPECIAL FIRE FIGHTING PROCEDURES Firefighters should wear self-contained breathing apparatus to avoid inhalation of smoke or vapors.

This information is furnished without warranty, representation, inducement or license of any kind, except that it is accurate to the best of Reichhold Chemicals, Inc.'s knowledge, or obtained from sources believed by Reichhold Chemicals, Inc. to be accurate, and Reichhold Chemicals, Inc. does not assume any legal responsibility for use or reliance upon same. Customers are encouraged to conduct their own tests. Before using any product, read its label.

842899512

**Section V — HEALTH HAZARD DATA**

## THRESHOLD LIMIT VALUE

See Section II

## EFFECTS OF OVEREXPOSURE

VAPORS: Irritating to eyes, nose and throat. Excess exposure may result in headache, dizziness and nausea. Defatting to skin.

## EMERGENCY AND FIRST AID PROCEDURES

INHALATION: Provide fresh air and rest. SKIN: Wash affected area with soap and water. INGESTION: DO NOT induce vomiting. Drink one or two glasses of water to dilute. See a physician. EYES: Flush with running water for 15 minutes.

**Section VI — REACTIVITY DATA**STABILITY ☐ UNSTABLE ☒ STABLE

CONDITIONS TO AVOID

Warm storage, ignition sources.

INCOMPATIBILITY (Materials to avoid)

Avoid strong, oxidizing agents.

HAZARDOUS DECOMPOSITION PRODUCTS

Resin solids contain only carbon, hydrogen, nitrogen and oxygen atoms; Thermal and oxidative decomposition produces smoke, fumes and other expected by products.

HAZARDOUS POLYMERIZATION ☐ MAY OCCUR ☒ WILL NOT OCCUR

CONDITIONS TO AVOID

**Section VII — SPILL OR LEAK PROCEDURES**

## STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Ventilate area. Remove all sources of ignition. Spread absorbant material and place in a closed container. Wear protective equipment during cleanup.

## WASTE DISPOSAL METHOD

Dispose of in a properly permitted chemical disposal facility in accordance with local, state and federal regulations.

**Section VIII — SPECIAL PROTECTION INFORMATION**

## RESPIRATORY PROTECTION

Should be worn to avoid breathing spray mist, heated vapors, or if TLV is exceeded.

## VENTILATION

Local exhaust and general ventilation recommended.

## PROTECTIVE GLOVES

Chemical resistant plastic or rubber.

## EYE PROTECTION

Chemical goggles.

## OTHER PROTECTIVE EQUIPMENT

Safety shower. Eye wash fountain.

**Section IX — SPECIAL PRECAUTIONS**

## PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

Avoid prolonged or repeated inhalation of heated vapors or spray mist. Keep away from heat.

## OTHER PRECAUTIONS

Avoid prolonged or repeated skin contact.

**CAMBRIDGE****Chemical Cleaning, Inc.**

ESTABLISHED 1948

P.O. Box 4220, 11 West 21st Street  
 Linden, New Jersey 07036  
 (201) 862-9363 Fax (201) 862-7818

**DAILY WORK SHEET**No. **3609**Start 7<sup>00</sup>Date **4/5/91 Friday**

Finish

P.O.# **147253**

**TANK CLEANING, REMOVAL & DISPOSAL  
 N.J. STATE LICENSED HAZARDOUS WASTE HAULER  
 HIGH PRESSURE WATER CLEANING**

CUSTOMER: BILL TO:

**Reichold Chemical****Doremus Ave****Newark N.J.****(201) 589-3709**

WORK DESCRIPTION:

**Do Necessary Vassing And Cleaning Of Spill On Ground  
 At Reichold Chemical Doremus Ave In Newark.**

WORK INSTRUCTIONS:

EMPLOYEE NAME	CLASS	HOURS		RATES			AMOUNT
		ST	OT	STRAIGHT	X1.5	X2	
<b>J.Chauca</b>	<b>Laborer</b>	<b>8</b>	<b>4</b>				
<b>E.Abbondante</b>	<b>Laborer</b>	<b>8</b>	<b>4</b>				
<del><b>M.Kraft Jr.</b></del>	<del><b>Laborer</b></del>						
				<b>TOTAL LABOR ➡</b>			

EQUIPMENT	HOURS	RATE	AMOUNT	MATERIAL	QTY.	UNIT PRICE	AMOUNT
<b>#1Pick-Up</b>	<b>12</b>						
<b>EQUIPMENT TOTAL ➡</b>				<b>MATERIAL TOTAL ➡</b>			

COMMENTS:

**TOTAL ➡**

Customer Approved

4. CUSTOMER COPY

**842899514**

**CAMBRIDGE****Chemical Cleaning, Inc.**

ESTABLISHED 1948

P.O. Box 4220, 11 West 21st Street  
 Linden, New Jersey 07036  
 (201) 862-9363 Fax (201) 862-7818

**DAILY WORK SHEET**No. **3608**Start 7<sup>00</sup>

Date 4/5/91 Friday

Finish

P.O.# 147253

**TANK CLEANING, REMOVAL & DISPOSAL  
 N.J. STATE LICENSED HAZARDOUS WASTE HAULER  
 HIGH PRESSURE WATER CLEANING**

CUSTOMER: BILL TO:

Reichold ChemicalDoremus AveNewark N.J.(201) 589-3709

WORK DESCRIPTION:

**Do Necessary Vaccuming And Cleaning Of Spill On  
 Ground At Reichold Chemical Doremus Ave In Newark**

WORK INSTRUCTIONS:

EMPLOYEE NAME	CLASS	HOURS		RATES			AMOUNT
		ST	OT	STRAIGHT	X1.5	X2	
J.Sofran	Super.	8	4				
J.Bosze	Oper.	8	4				
C.Cromwell	Oper.	8	4				
.Pagan	Laborer	8	4				
S.Rudnicki	Laborer	8	4				
				<b>TOTAL LABOR ➡</b>			

EQUIPMENT	HOURS	RATE	AMOUNT	MATERIAL	QTY.	UNIT PRICE	AMOUNT
#31 Vac Truck	12			Truck Suits	6		
#36 Vac Truck	12			Rain Gear	6		
				Gloves	6		
<b>EQUIPMENT TOTAL ➡</b>				<b>MATERIAL TOTAL ➡</b>			

COMMENTS:

**TOTAL ➡**

Customer Approved



**Reichhold Chemicals, Inc.**  
Coating Polymers & Resins Division  
400 Doremus Avenue  
Newark, NJ 07105

**REICHHOLD**

June 20, 1991

Mr. Mario Graglia  
Passaic Valley Sewerage Authority  
600 Wilson Avenue  
Newark, N.J. 07105

Dear Mr. Graglia:

We are in receipt of your letter granting Reichhold permission to discharge approximately 50,000 gallons of wash water.

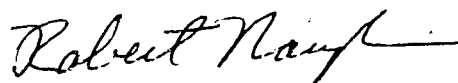
Be assured that all of the conditions outlined in your letter have been met.

As previously discussed, the butyl alcohol which had been spilled was removed and disposed of at a waste treatment facility. In-house laboratory analysis proved that no alcohol remained.

Prior to discharge the water will be treated to meet all requirements as specified in our Sewer Connection Permit.

Please call me if I can be of any further assistance.

Very truly yours,



Robert Naujelis  
Environmental & Safety Manager

RN/glm

DONALD TUCKER  
CHAIRMAN

RAYMOND LUCHKO  
VICE CHAIRMAN

ROBERT M. BURKE, JR.  
THOMAS J. CIFELLI  
JAMES KRONE  
FRANK ORECHIO  
COMMISSIONERS



**Passaic Valley  
Sewerage Commissioners**

**600 WILSON AVENUE  
NEWARK, N.J. 07105  
(201) 344-1800  
Fax: (201) 344-2951**

CARMINE T. PERRAPATO  
EXECUTIVE DIRECTOR

ROBERT J. DAVENPORT ✓  
DEPUTY EXECUTIVE DIRECTOR

GABRIEL M. AMBROSIO  
CHIEF COUNSEL

LOUIS LANZILLO  
CLERK

June 6, 1991

Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey 07105

Attn: Robert Naujelis  
Environmental & Safety Manager

**RE: SPILL CLEANUP OF CONTAMINATED DIKE**

Dear Mr. Naujelis:

This is in response to your letter dated May 24, 1991, wherein you requested permission to discharge approximately 50,000 gallons of wash water into the sanitary sewer at the Reichhold Chemical site, 400 Doremus Avenue, Newark. PVSC will permit this discharge subject to the following conditions:

1. All PVSC Rules and Regulations are followed.
2. Be certain not to surcharge any sewer line.
3. This is a one time discharge, any other discharge shall be requested in writing.
4. Before discharge an analysis of all parameters listed in Reichhold's Sewer Connection Permit must be completed and submitted to PVSC.
5. Please contact Mario Graglia at 201-817-5724 three days before discharge is to commence.

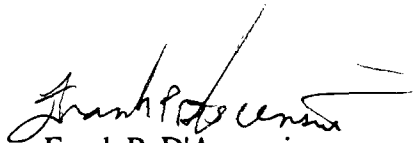
842899517

Reichhold Chemicals, Inc.  
Page 2

It is also important to note that all permit limits shall be in compliance before discharge.  
If you have any questions, please call Carmen DelaPia at 201-817-5717.

Very truly yours,

PASSAIC VALLEY SEWERAGE COMMISSIONERS



Frank P. D'Ascensio  
Manager Industrial Waste & Pollution Control

CTP:jw

cc: Carmine T. Perrapato, Executive Director  
Robert J. Davenport, Deputy Executive Director  
Mario Graglia  
Tom Mack  
Carmen DelaPia ✓

842899518

# REICHOLD NEWS

Post-It™ brand fax transmittal memo 7671		# of pages >	
To	DAVE BRIGHT	From	S. BRECHBIEL
Co.	NEWARK - RCI	Co.	

Contact: Rick French (919)361-7632  
Steve Brechbiel (919)361-7643

Post-It™ brand fax transmittal memo 7671		# of pages >	
To	L. Finnegan	From	S. Brechbiel
Co.		Co.	
Dept.		Phone #	
Fax #		Fax #	

For Immediate Release: April 3, 199

Late Sunday evening, approximately 4500 gallons of alklyd resins leaked from two storage tanks at Reichhold's Doremus Avenue, Newark plant.

The resin was contained by a concrete dike surrounding the area. Upon discovering the spill Monday morning, Reichhold personnel notified the New Jersey Department of Environmental Protection (NJDEP), Newark Fire Department and the National Response Center.

The cause for the leak has been termed "suspicious" and is currently under investigation by the Newark Police Department. Each of the storage tanks had a valve left open, which caused the resin to empty into the containment area. Upon further examination, a third tank's valve was found to be open. This valve was secured.

Cambridge Chemical Cleaning Inc., an independent contractor, has been brought to the site to provide clean-up assistance. Ingredients in the resin include butanol and xylene.

On Tuesday evening, April 2, approximately 600 gallons of Butanol spilled in a tank loading area and was contained by a similar concrete dike. The spill occurred when an employee, not following standard safety procedures, overfilled a storage tank.

Early Wednesday morning, following discovery of the spill, NJDEP, Newark Fire and the National Response Center were again notified.

The Newark Fire Department diluted the Butanol with water to reduce flamability. Cambridge is proceeding with a cleanup of the area.

This afternoon, Reichhold personnel noticed a small quantity of resin material from Sunday's spill on the Passaic River. Cambridge personnel immediately placed a water boom around the area. A second company, Clean Ventures, was contacted to further secure the area. The resin involved appears to be less than 50 lbs. of material, most of which has washed up on Reichhold property. The Coast Guard was also notified.

As a result of the supicious nature of Sunday night's spill, security has been increased at the plant. Investigations into both incidents are continuing. The plant is fully operational at this time.

# # #

*NOTE: This was never released.*

842899519

REICHHOLD

*Cleanup Incident*

interoffice communication

TO: Dave Bright

FROM: Ann Marie Hansen

LOCATION: Newark (D)

DATE: April 3, 1991

SUBJECT: Cost of material  
lost in spills

4/1/91 Incident

Product 93210 - 26,160 #'s @ .5312 (std.) = \$ 13,896.

Product 14635 - 12,378 #'s @ .3862 (std.) = \$ 4,780.  
\$ 18,676.

4/3/91 Incident

*Based on  
1600 gals*

Product 07004 - 10,752 #'s @ .3300 (std.) = \$ 3,548.

TOTAL \$ 22,224.

Any questions, please call.

842899520

## MATERIAL SAFETY DATA SHEET

Information Telephone No. 800-874-5403

REICHOLD CHEMICALS, INC.

Coating Polymers &amp; Resins Division

P. O. Box 13582

Research Triangle Park, NC 27709

ALL CHEMICAL EMERGENCIES

1-800-424-9300

Issue Date: 01/25/91

Page 1

## SECTION I - PRODUCT IDENTIFICATION

Product Code: 14-635

Trade Name: AROPLAZ(R) 310-V-50

Product Class: Alkyd Resin Solution

C.A.S. Number: Mixture

HMIS Rating: Health = 1 Fire = 3 Reactivity = 0

## SECTION II - INGREDIENTS

Ingredients	CAS #	Weight	Exposure
		max. %	Limits
Alkyd resin	Proprietary	50.0	None assigned
VM&P Naphtha	8032-32-4	45.0	100.0 ppm
Mineral Spirits	8052-41-3	3.0	100.0 ppm
Xylene	1330-20-7	2.0	100.0 ppm

## SECTION III - PHYSICAL DATA

Boiling Point: 230-385 Deg. F.

Vapor Density: Heavier than Air.

Volatile %: 60 by volume.

Specific Grav: 0.90

Evap. Rate: Slower than n-Butyl Acetate.

Appearance: Clear amber liquid with aromatic odor.

## SECTION IV - FIRE AND EXPLOSION HAZARD DATA

Flammability Class: 1B

Flash Point: 53 Deg. F.

LEL: 1.0

## -EXTINGUISHING MEDIA:

Foam, dry chemical, carbon dioxide or any Class B extinguishing agent. Water may be unsuitable as an extinguishing medium, but helpful in keeping adjacent containers cool.

## -SPECIAL FIREFIGHTING PROCEDURES:

Firefighters and others exposed to vapors or products of combustion should wear self-contained breathing apparatus.

## -UNUSUAL FIRE &amp; EXPLOSION HAZARDS:

Vapors may form an explosive mixture in air. Closed containers may rupture when exposed to extreme heat.

## SECTION V - HEALTH HAZARD DATA

## -PERMISSIBLE EXPOSURE LEVEL:

OSHA PEL and ACGIH TLV for VM&P naphtha is 300 ppm for an 8-hour TWA. OSHA has established a 400 ppm 15-minute STEL for VM&P naphtha.

The OSHA PEL and ACGIH TLV for Stoddard solvent (which is similar to mineral spirits) are 100 ppm for an 8-hour TWA.

The OSHA PEL and ACGIH TLV for xylene are currently set at (cont.)

This information is furnished without warranty, representation inducement or license of any kind, except that is accurate to the best of Reichhold Chemicals, Inc. knowledge, or obtained from sources believed by Reichhold Chemicals, Inc. to be accurate, and Reichhold Chemicals, Inc. does not assume any legal responsibility for use or reliance upon same. Customers are encouraged to conduct their own tests. Before using any product, read its label.

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Product Code: 14-635

Issue Date: 01/25/91

Page 2

## SECTION V - HEALTH HAZARD DATA (cont.)

## -PERMISSIBLE EXPOSURE LEVEL: (cont.)

100 ppm for an 8-hour TWA. The STEL for xylene is currently set at 150 ppm.

## -EFFECTS OF OVEREXPOSURE:

SKIN: This material may cause defatting and irritation of skin. Prolonged or repeated contact may cause dermatitis.

INHALATION: Excessive exposure to vapors or spray mists can result in headache, dizziness, incoordination, nausea and loss of consciousness. Some reports have associated repeated and prolonged occupational overexposure to solvents with permanent brain and nervous system damage.

EYES: This material may be an eye irritant.

## -FIRST AID:

SKIN: Wash with soap and water immediately.

EYES: Flush with large quantities of water for 15 minutes and seek medical attention.

INGESTION: If ingested DO NOT induce vomiting, keep person warm, quiet, and get medical attention. Aspiration of material into lungs can cause chemical pneumonitis which can be fatal.

INHALATION: Remove victim to fresh air immediately. If coughing, difficult breathing or any other respiratory symptoms develop, seek medical attention at once.

## -PRIMARY ROUTE(S) OF ENTRY:

Inhalation.

Skin contact.

## -CARCINOGENICITY:

This product does not contain 0.1% or more of any substance which is listed as a carcinogen by IARC, NTP or OSHA.

## SECTION VI - REACTIVITY DATA

STABILITY: [ ] Unstable [x] Stable

HAZARDOUS POLYMERIZATION: [ ] May occur [x] Will not occur

## -INCOMPATIBILITY:

Avoid contact with strong oxidizing agents.

## -CONDITIONS TO AVOID:

Warm storage and ignition sources.

## -HAZARDOUS DECOMPOSITION PRODUCTS:

Incomplete combustion can yield carbon monoxide and toxic vapors.

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## MATERIAL SAFETY DATA SHEET

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REICHOLD CHEMICALS, INC.

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P. O. Box 13582

Research Triangle Park, NC 27709

ALL CHEMICAL EMERGENCIES

1-800-424-9300

Product Code: 14-635

Issue Date: 01/25/91

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## SECTION VII - SPILL OR LEAK PROCEDURES

~~STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:~~

Remove all sources of ignition. Ventilate area. Absorb spill with an absorbent material such as sawdust, vermiculite or sand and place material into a closed container. If large spill, dike area to prevent this material from entering water systems or sewers. Wear protective equipment during cleanup.

This material contains the following ingredients which, if spilled or released in quantities equal to or greater than the Reportable Quantity (RQ), are subject to the reporting requirements of CERCLA and/or SARA (40 CFR Parts 302 & 355):

Xylene

RQ Value = 1000 lbs.

~~WASTE DISPOSAL METHOD:~~

This material has been tested and found to have a flash point below 140 degrees Fahrenheit. If discarded, this material and containers should be treated as hazardous wastes based on the characteristic of ignitability as defined under federal RCRA regulations (40 CFR 261). Disposal of this material or its container requires compliance with applicable labeling, packaging, and recordkeeping standards. Extreme care should be taken to ensure that it is disposed of only in a facility permitted for disposal of hazardous waste.

For further information, contact your state or local waste agency or the United States Environmental Protection Agency's RCRA hotline (1-800-424-9346 or 202-382-3000).

## SECTION VIII - SPECIAL PROTECTION INFORMATION

~~RESPIRATORY PROTECTION:~~

A canister-type respirator must be worn to prevent the inhalation of vapors or spray mists when the TLV or PEL is exceeded.

~~VENTILATION:~~

General ventilation is required during normal use. Local ventilation may be required during certain operations to keep exposure level below the limits listed in Section II of this data sheet.

~~PROTECTIVE GLOVES:~~

Chemical-resistant nitrile, neoprene or rubber gloves required.

~~EYE PROTECTION:~~

Wear face shield or chemical goggles.

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MATERIAL SAFETY DATA SHEET

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ALL CHEMICAL EMERGENCIES

1-800-424-9300

Product Code: 14-635

Issue Date: 01/25/91

Page 4

SECTION VIII - SPECIAL PROTECTION INFORMATION (cont.)

-OTHER PROTECTIVE EQUIPMENT:

Wear protective clothing to prevent skin contact.

Eye wash station and safety shower should be available.

SECTION IX - SPECIAL PRECAUTIONS

-PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING:

Avoid prolonged or repeated inhalation of heated vapors or spray mists. Keep away from heat or open flame. Avoid prolonged or repeated skin contact.

-OTHER PRECAUTIONS:

None known.

SECTION X - SUPPLEMENTAL INFORMATION

-REGULATORY INFORMATION:

None.

-SARA HAZARD CLASSIFICATION:

This material has been categorized as having the following hazard(s) as defined by SARA Title III regulations (40 CFR 370): acute, chronic, fire.

-SARA SECTION 313 LISTED INGREDIENTS:

The following ingredients in this material are subject to the reporting requirements of section 313 of SARA and 40 CFR 372 [see Section II for percentage of ingredient(s)]:

Xylene (1330-20-7)

-DOT PROPER SHIPPING NAME:

Resin solution

-UN NUMBER:

UN1866

-DOT HAZARD CLASS:

Flammable liquid

This information is furnished without warranty, representation inducement or license of any kind, except that is accurate to the best of Reichhold Chemicals, Inc. knowledge, or obtained from sources believed by Reichhold Chemicals, Inc. to be accurate, and Reichhold Chemicals, Inc. does not assume any legal responsibility for use or reliance upon same. Customers are encouraged to conduct their own tests. Before using any product, read its label.

842899524



DWAYNE HARRINGTON

ENVIRONMENTAL SCIENTIST - OSC

INCIDENT RESPONSE AND PREVENTION SECTION

U.S. ENVIRONMENTAL PROTECTION AGENCY

EMERGENCY AND

REMEDIATION RESPONSE DIVISION

EDISON, NJ 08837

OFFICE (201) 906-6899

24 Hr (201) 548-8730

(908) 321-4356

DILSHAD J. PERERA

US EPA, REGION II

RESPONSE & PREVENTION BRANCH

BUILDING 209, (MS-211)

2890 ~~24~~ WOODBRIDGE AVE

EDISON, NJ 08837

[address SPCC plan to  
Carl Pelligrino, same address]

842899525



State of New Jersey

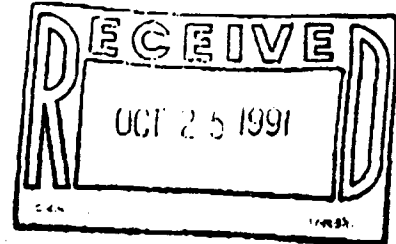
DEPARTMENT OF LAW AND PUBLIC SAFETY  
DIVISION OF LAWRICHARD J. HUGHES JUSTICE COMPLEX  
CN 093  
TRENTON 08625

To: VICKY WILL	From: BOB NAJUL
Co.	Co.
Dept.	Phone #
Fax #	Fax #

ROBERT J. DEL TUFO  
ATTORNEY GENERALEDWARD J. DAUBER  
ASSISTANT ATTORNEY GENERAL  
DIRECTOR

(609) 633-8254

October 24, 1991

Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey 07105Re: State of New Jersey v. Reichhold Chemicals  
State Police Summons No. 55783  
Case File # F0109170

Gentlemen:

You were issued a summons by the New Jersey State Police for a violation of N.J.S.A. 23:5-28. This matter will be heard before the Superior Court of New Jersey, Essex County, Special Civil Part, on October 31, 1991 at 1:30 p.m. at the Essex County Court House, 490 Dr. Martin Luther King, Jr. Boulevard, Newark, New Jersey.

For your information, a copy of the statute is attached. You will note that the possible maximum penalty for this violation is \$6,000. However, the statute permits the State to offer you a compromise and settlement for the claim of this civil penalty. For this matter, the State will offer you a compromise and settlement in the amount of \$1,500. If you wish to accept this compromise and settlement, this matter will be terminated. You are advised that you have a right to a trial in this matter and that you have a right to have a judge adjudicate whether or not you are liable for a civil penalty and for the judge to decide the amount, up to the possible maximum amount, that you are liable for.

Should you wish to accept the offer of compromise and settlement outlined above, kindly send your check in the amount of \$1,515, which includes \$15 cost of Court to:

Essex County Special Civil Part  
Attn: Jack Broske  
Essex County Court House, Room 107  
490 Martin Luther King, Jr. Boulevard  
Newark, New Jersey 07102

October 24, 1991

Page 2

YOU MUST MAKE REFERENCE ON YOUR CHECK TO THE COURT DOCKET NUMBER, IF PROVIDED, AND THE STATE POLICE SUMMONS NUMBER. MAKE THE CHECK PAYABLE TO "ESSEX COUNTY SUPERIOR COURT, SPECIAL CIVIL PART". For your information, these are civil penalty matters. They are not criminal or quasi-criminal and in essence the matter is in a nature of a civil dispute between you and the State.

This offer of compromise and settlement made to you is without prejudice as to the position of the State of New Jersey. This offer of compromise and settlement is conditioned upon the fact that you must prior to the court date clean up the material that is the subject of this violation. As you may note from your reading of the statute, every day that the violation continues is a separate and continuing violation. If the material is not cleaned up, you may be issued another summons.

You are advised that if you fail to appear on the Court date without having settled the matter or having been excused by the Court, the State will ask the Court to issue a bench warrant for your arrest.

Very truly yours,

ROBERT J. DEL TUFO  
ATTORNEY GENERAL OF NEW JERSEY

By: 

Anthony T. Drollas, Jr.  
Deputy Attorney General

cc: Special Civil Part, Attention: Jack Broske  
State Police Marine Bureau, Lt. Gronikowski  
Deputy Chief Winkel, Fish and Game  
Docketing Section, Division of Law

842899527

**READ CAREFULLY  
COURT APPEARANCE REQUIRED**

If the other side of this summons is checked at the bottom, "court appearance required", you must appear in Court at the time and place indicated or where otherwise directed.

If the summons is not checked, you must still appear in Court if:

- a. You wish to contest the charge, or
- b. The violation is not payable as below.

A summons for an offense for which the penalty exceeds \$50 must be responded to by appearance in court on the date set.

Payment of penalties not exceeding \$50 for each offense:

Rule 4:70-4(a) of the Rules Governing the Courts of New Jersey provides that where the law fixes a penalty that does not exceed \$50 for each offense, including where the minimum statutory penalty does not exceed \$50 for each offense, the defendant at any time before the hearing date, upon presentation of a signed plea of guilty and waiver of trial endorsed on the summons, may pay the penalty and costs by appearing before the court or violations clerk or by mailing the same to the court or violations clerk.

If you are guilty of the violation(s) charged, and wish to plead guilty, you may at any time before the hearing date appear personally before the court or you may mail this summons, together with the penalty and costs to the court at the address on the front of this summons.

The court will dispose of your violation if (1) you turn in this summons, with the appearance, plea and waiver hereon duly signed, and (2) pay the penalty and costs fixed by the Statute for such violation.

For the violation with which you are charged a penalty of \$ \_\_\_\_\_ is prescribed.

You may telephone the court at the number on the front of this summons with questions concerning the charge or prescribed penalty.

**NOTICE**

The court will issue a warrant for the arrest of any defendant who is a resident of this State and who has failed to appear to answer a summons duly served upon him and upon which a complaint has been filed.

**APPEARANCE, PLEA AND WAIVER**

I, the undersigned, do hereby enter my appearance on the Complaint the violation charged in this Summons. I know that I have a right to trial, that my signature to this plea of guilty will have the same force and effect as a conviction in court. I do hereby PLEAD GUILTY to said violation as charged, WAIVE my right to a HEARING by the Court, and agree to pay the penalty and costs prescribed for the violation. I know that the law provides for revocation of my hunting, fishing or trapping license for an accumulation of violations.

(Defendant's Signature)

Street Address \_\_\_\_\_

(Present Address)

CITY \_\_\_\_\_

STATE \_\_\_\_\_

ZIP CODE \_\_\_\_\_

(Hunting/Fishing/Trapping License Number)

(Payment through the Violations Bureau will not be accepted unless this Summons, with the above Appearance, Plea and Waiver properly completed, is mailed or presented to the Violations Bureau with payment in the proper amount.)

**Nº 55783 SUMMONS**

☐ Municipal Court  
☐ Superior Court

OF \_\_\_\_\_

DOCKET # \_\_\_\_\_ RECEIPT # \_\_\_\_\_ AMT. \$ \_\_\_\_\_

STATE OF NEW JERSEY

COUNTY OF ESSEX } ss.

CERTIFIES THAT ON: 10/17

THE UNDERSIGNED,

VIOLATION	MONTH	DAY	YEAR	TIME	AM	PM	DOB
DATE	<u>10</u>	<u>17</u>	<u>1991</u>	<u>11</u>	<u>00</u>	<u>PM</u>	<u>11</u>
NAME	FIRST		M. INITIAL		LAST (Please Print)		
<u>Reynolds, Raymond</u>							
ADDRESS	<u>470 DORMAN AVE</u>						
CITY	STATE		ZIP CODE	TELEPHONE			
<u>NEWARK</u>	<u>NJ</u>		<u>07105</u>	<u>557-589-72</u>			
LIC. NO.	RESIDENT <input type="checkbox"/>	NONRESIDENT <input type="checkbox"/>	HUNT <input type="checkbox"/>	FISH <input type="checkbox"/>	TRAP <input type="checkbox"/>	SEA <input type="checkbox"/>	OL <input type="checkbox"/>
SEX	WEIGHT		HEIGHT				
<u>MALE</u>	<u>150</u>		<u>5'10"</u>				

YOU ARE HEREBY SUMMONED TO APPEAR PERSONALLY BEFORE THIS COURT AT THE TIME AND PLACE SPECIFIED BELOW TO ANSWER THE FOLLOWING VIOLATION(S):

IN THE MUNICIPALITY OF NEWARK

COUNTY OF ESSEX, STATE OF NEW JERSEY

DID UNLAWFULLY VIOLATE THE PROVISIONS OF

N.J.S.A. 23:5-28 N.J.A.C. \_\_\_\_\_

BY COMMITTING THE FOLLOWING VIOLATION(S):

- ☐ \_\_\_\_\_ without first procuring the proper license (Fish, hunt, or trap).
- ☐ Activity \_\_\_\_\_
- ☐ Fish closed (waters) (season)
- ☒ While (hunting) (fishing) (trapping) (all to (display) (exhibit) the license number tag issue
- ☐ Use while hunting a firearm capable of holding more than three shells.
- ☐ Have in possession a weapon capable of killing deer while casting the rays of an illuminator device in an area where deer may be found.

OTHER VIOLATION Did allow Rodent  
to enter the National  
of NW, Forest Park

THE UNDERSIGNED FURTHER STATES THAT HE HAS JUST AND REASONABLE GROUND TO BELIEVE AND DOES BELIEVE THAT THE PERSON NAMED ABOVE COMMITTED THE OFFENSE(S) HEREIN SET FORTH CONTRARY TO LAW.

DATE 10-3-91 MR. R. H. ...

Signature and Identification of Conservation Officer or other complainant, to be signed with issuing summons

NOTICE: Read the back of this summons carefully; bring summons with you. You have been served with a summons returnable on a date named here. If it is your intention to plead not guilty and to contest the charge, you shall at least three days before the return date, state such intent on to the clerk of the court whose address and telephone number you will find on the summons, otherwise it may be necessary to make two court appearances.

COURT APPEARANCE REQUIRED ☐

COURT APPEARANCE \_\_\_\_\_ DAY OF TO BE NOTED 19 \_\_\_\_\_ AT \_\_\_\_\_

ADDRESS OF COURT \_\_\_\_\_

TELEPHONE \_\_\_\_\_

**SUMMONS**

Revised June 1, 1988

842899528

**Reichhold Chemicals, Inc.**  
Coating Polymers & Resins Division  
400 Doremus Avenue  
Newark, NJ 07105

RECEIVED APR 29 1991

REICHHOLD

April 26, 1991


Mr. Sailesh Balakrishnan  
NJ DEP  
Bureau of Industrial Site Evaluation  
401 E. State Street, 5th Floor East  
CN 028  
Trenton, N.J. 08625

Dear Mr. Balakrishnan:

As per your request to Mr. Bright, enclosed are copies of reports for spills which occurred between March 31 and April 3, 1991.

Please feel free to contact me at the below listed telephone number if I can be of any further assistance.

Sincerely,

  
Robert Naujelis  
Environmental & Safety Manager

RN/glm  
enclosure

cc: D. Bright

**Reichhold Chemicals, Inc.**  
Coating Polymers & Resins Division  
400 Doremus Avenue  
Newark, NJ 07105

**REICHHOLD**

April 22, 1991

Office of Hazardous Substance Control  
Division of Water Resources  
P.O. Box 2809  
Trenton, N.J. 08625  
Attn.: Discharge Confirmation

Dear Sirs:

On Sunday evening, March 31, 1991, approximately 4,500 gallons of alkyd resin material was released from two above ground storage tanks. This spill occurred at our facility located at the above address, and was reported by:

Robert Naujelis  
Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, N.J. 07105  
(201) 589-3709

Facility EPA ID Number: NJD092217892

The following two materials were spilled:

1. Beckamine 93-210 Resin Solution .....3,000 gallons
2. Aroplaz (R) 310-V-50 Resin Solution .....1,500 gallons  
(Material Safety Data Sheets for both products are attached hereto.)

The spill was discovered at approximately 4:00 a.m. on Monday morning, by the plant superintendent during a routine walk-through of the facility. The material was released from two sample valves which had been left open. It was discharged into a cement dike which housed both tanks. All of the material was contained within the diked area.

Immediately upon discovery, the valve to one of the tanks was shut, cutting off the flow. The second opened valve was not discovered until approximately 10:30 Monday morning, at which time it was also shut. The cause of the spill has been termed "suspicious" and is under investigation by the Newark Police Department.

At approximately 7:00 a.m., our cleanup contractor, Cambridge Chemical Cleaning, Inc. was called to the scene. Cleanup operations commenced at 9:00 a.m. and

(201) 589-3709  
(201) 817-9173 (Facsimile)

**842899530**

Page Two

were concluded on April 12, 1991.

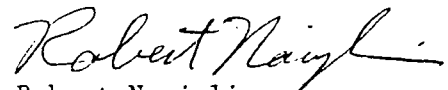
The spill was reported to the following agencies with the corresponding case numbers:

1. New Jersey Dept. of Environmental Protection  
Case Number: 91-4-1-1222-44
2. National Response Center  
Case Number: 66022

In an effort to prevent this situation from occurring in the future, the following steps are being taken:

1. A 24 hour guard service is being hired to provide security at the facility. A temporary guard service is manning the entrance to the site.
2. Training will be re-enforced in order to inform employees of the environmental and safety hazards associated with chemical spills.
3. The method by which tank monitoring is conducted will be evaluated to see how it can be improved to prevent spills of this nature from occurring in the future.

Very truly yours,

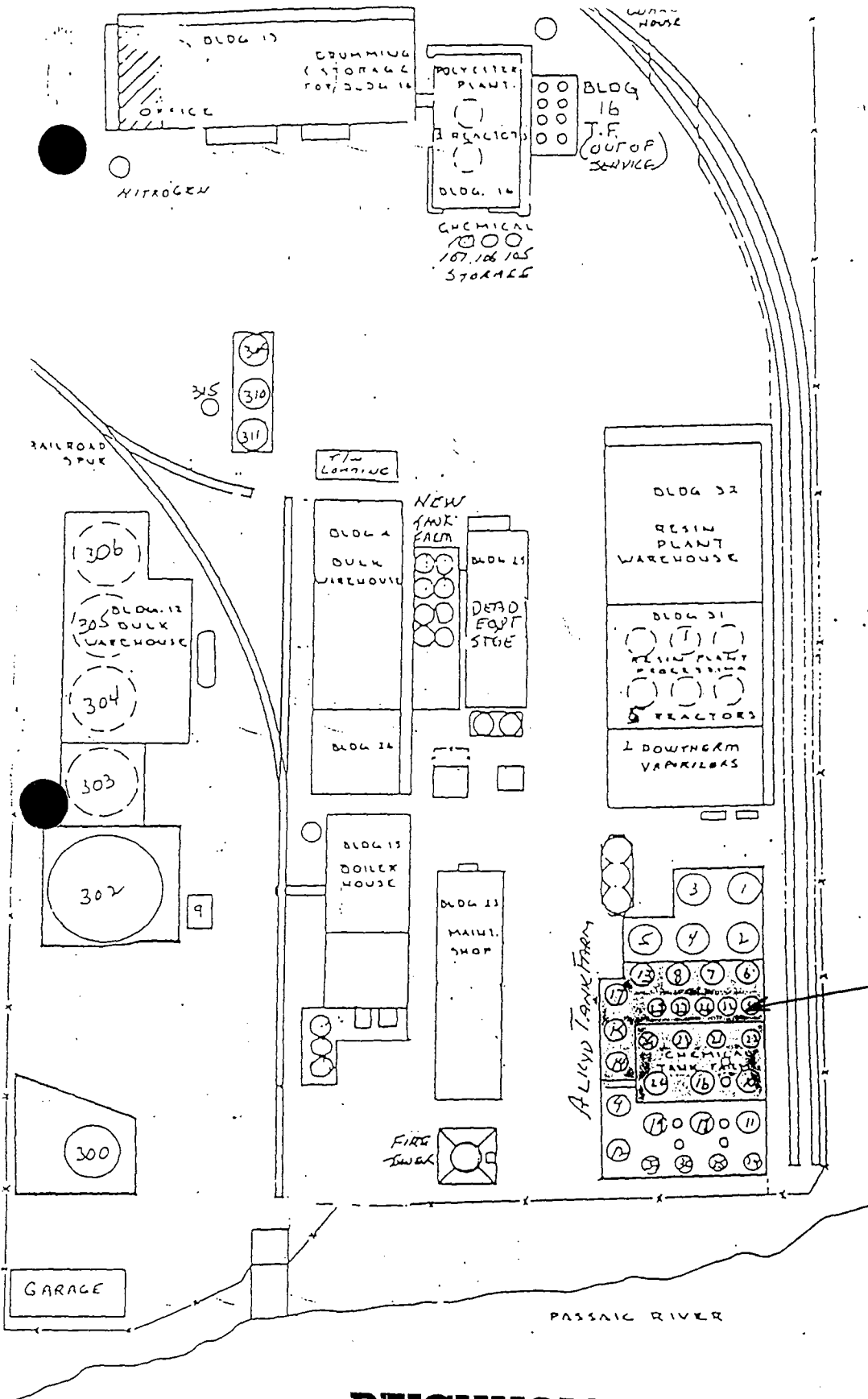


Robert Naujelis  
Environmental & Safety Manager

RN/glm

842899531





SPILL CONTAINED IN  
THIS DIKED AREA

## REICHHOLD

400 Doremus Ave.  
Newark, N.J. 07105

# MATERIAL SAFETY DATA SHEET

(Approved by U.S. Department of Labor "Essentially Similar" to Form OSHA-20)

Reichhold Chemicals, Inc.

525 North Broadway, White Plains, N.Y. 10603

**REICHHOLD®**

PERFORMANCE TECHNOLOGY

INFORMATION

TELEPHONE NO: (914) 682-5700

REVISION

DATE: 2/86

EMERGENCY PHONE NUMBER •

800-423-3003 / 800-442-4844  
(in continental U.S. — except N.Y.) / (in N.Y. State)

• These numbers are available  
days, nights, weekends, and holidays.

## Section I — IDENTIFICATION

PRODUCT NAME	BECKAMINE <sup>(R)</sup> 93-210	CHEMICAL NAME OR FAMILY	Synthetic Resin Solution
FORMULA	PROPRIETARY	TRADENAME	BECKAMINE <sup>(R)</sup>
DOT SHIPPING NAME	Resin Solution - UN 1866	DOT HAZARD CLASS	Flammable Liquid

## Section II — IMPORTANT COMPONENTS

62% Resin Solids 27% Butanol 11% Xylene <3% Formaldehyde	PERMISSABLE EXPOSURE CONCENTRATION  Not Established 50 ppm (SKIN) (ACGIH) 100 ppm (ACGIH) 1 ppm (ACGIH) [potentially carcinogenic for man (NTP & IARC)]
-------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------

## Section III — PHYSICAL DATA

MELTING POINT (°F)	243-288	SPECIFIC GRAVITY (H <sub>2</sub> O = 1)	1.04
VAPOR PRESSURE (mm Hg.)	9.5 @ 20°C	PERCENT VOLATILE BY VOLUME (%)	49
VAPOR DENSITY (AIR = 1)	Greater than one	EVAPORATION RATE (Ethyl Ether-1)	Less than one
SOLUBILITY IN WATER	Slightly soluble		
APPEARANCE AND ODOR	Clear liquid, pungent aromatic odor.		

## Section IV — FIRE AND EXPLOSION HAZARD DATA

FLAMMABILITY CLASSIFICATION	Class 1C	FLASH POINT	95°F (SFCC)	LEL	1.0%
EXTINGUISHING MEDIA	Carbon dioxide, dry chemical, foam.				
UNUSUAL FIRE AND EXPLOSION HAZARDS	Isolate from heat, electrical equipment, sparks and open flames. Closed containers may rupture when exposed to extreme heat.				
SPECIAL FIRE FIGHTING PROCEDURES	Firefighters should wear self-contained breathing apparatus to avoid inhalation of smoke or vapors.				

This information is furnished without warranty, representation, inducement or license of any kind, except that it is accurate to the best of Reichhold Chemicals, Inc.'s knowledge, or obtained from sources believed by Reichhold Chemicals, Inc. to be accurate, and Reichhold Chemicals, Inc. does not assume any legal responsibility for use or reliance upon same. Customers are encouraged to conduct their own tests. Before using any product, read its label.

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## Section V — HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE

See Section II

EFFECTS OF OVEREXPOSURE

VAPORS: Irritating to eyes, nose and throat. Excess exposure may result in headache, dizziness and nausea. Defatting to skin.

EMERGENCY AND FIRST AID PROCEDURES

INHALATION: Provide fresh air and rest. SKIN: Wash affected area with soap and water. INGESTION: DO NOT induce vomiting. Drink one or two glasses of water to dilute. See a physician. EYES: Flush with running water for 15 minutes.

## Section VI — REACTIVITY DATA

STABILITY ☐ UNSTABLE ☒ STABLE

CONDITIONS TO AVOID

INCOMPATIBILITY (Materials to avoid)

Warm storage, ignition sources.

HAZARDOUS DECOMPOSITION PRODUCTS

Avoid strong, oxidizing agents.  
Resin solids contain only carbon, hydrogen, nitrogen and oxygen atoms; Thermal and oxidative decomposition produces smoke, fumes and other expected by products.

HAZARDOUS POLYMERIZATION

☐ MAY OCCUR

☒ WILL NOT OCCUR

CONDITIONS TO AVOID

## Section VII — SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Ventilate area. Remove all sources of ignition. Spread absorbant material and place in a closed container. Wear protective equipment during cleanup.

WASTE DISPOSAL METHOD

Dispose of in a properly permitted chemical disposal facility in accordance with local, state and federal regulations.

## Section VIII — SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION

Should be worn to avoid breathing spray mist, heated vapors, or if TLV is exceeded.

VENTILATION

Local exhaust and general ventilation recommended.

PROTECTIVE GLOVES

Chemical resistant plastic or rubber.

EYE PROTECTION

Chemical goggles.

OTHER PROTECTIVE EQUIPMENT

Safety shower. Eye wash fountain.

## Section IX — SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

Avoid prolonged or repeated inhalation of heated vapors or spray mist. Keep away from heat.

OTHER PRECAUTIONS

Avoid prolonged or repeated skin contact.

# MATERIAL SAFETY DATA SHEET

Information Telephone No. 800-874-5403

REICHOLD CHEMICALS, INC.

Coating Polymers & Resins Division

P. O. Box 13582

Research Triangle Park, NC 27709

ALL CHEMICAL EMERGENCIES

1-800-424-9301

Issue Date: 01/25/91

Page

## SECTION I - PRODUCT IDENTIFICATION

Product Code: 14-635

Trade Name: AROPLAZ(R) 310-V-50

Product Class: Alkyd Resin Solution

C.A.S. Number: Mixture

HMIS Rating: Health = 1 Fire = 3 Reactivity = 0

## SECTION II - INGREDIENTS

Ingredients	CAS #	Weight	Exposure
		max. %	Limits
Alkyd resin	Proprietary	50.0	None assigned
VM&P Naphtha	8032-32-4	45.0	100.0 ppm
Mineral Spirits	8052-41-3	3.0	100.0 ppm
Xylene	1330-20-7	2.0	100.0 ppm

## SECTION III - PHYSICAL DATA

Boiling Point: 230-385 Deg. F.

Vapor Density: Heavier than Air.

Volatile %: 60 by volume.

Specific Grav: 0.90

Evap. Rate: Slower than n-Butyl Acetate.

Appearance: Clear amber liquid with aromatic odor.

## SECTION IV - FIRE AND EXPLOSION HAZARD DATA

Flammability Class: 1B

Flash Point: 53 Deg. F.

LEL: 1.0

### -EXTINGUISHING MEDIA:

Foam, dry chemical, carbon dioxide or any Class B extinguishing agent. Water may be unsuitable as an extinguishing medium, but helpful in keeping adjacent containers cool.

### -SPECIAL FIREFIGHTING PROCEDURES:

Firefighters and others exposed to vapors or products of combustion should wear self-contained breathing apparatus.

### -UNUSUAL FIRE & EXPLOSION HAZARDS:

Vapors may form an explosive mixture in air. Closed containers may rupture when exposed to extreme heat.

## SECTION V - HEALTH HAZARD DATA

### -PERMISSIBLE EXPOSURE LEVEL:

OSHA PEL and ACGIH TLV for VM&P naphtha is 300 ppm for an 8-hour TWA. OSHA has established a 400 ppm 15-minute STEL for VM&P naphtha.

The OSHA PEL and ACGIH TLV for Stoddard solvent (which is similar to mineral spirits) are 100 ppm for an 8-hour TWA.

The OSHA PEL and ACGIH TLV for xylene are currently set at (cont.)

This information is furnished without warranty, representation inducement or license of any kind, except that is accurate to the best of Reichhold Chemicals, Inc. knowledge, or obtained from sources believed by Reichhold Chemicals, Inc. to be accurate, and Reichhold Chemicals, Inc. does not assume any legal responsibility for use or reliance upon same. Customers are encouraged to conduct their own tests. Before using any product, read its label.

842899535

# MATERIAL SAFETY DATA SHEET

Information Telephone No. 800-874-5403

REICHHOLD CHEMICALS, INC.

Coating Polymers & Resins Division

P. O. Box 13582

Research Triangle Park, NC 27709

ALL CHEMICAL EMERGENCIES

1-800-424-9300

Product Code: 14-635

Issue Date: 01/25/91

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## SECTION V - HEALTH HAZARD DATA (cont.)

### -PERMISSIBLE EXPOSURE LEVEL: (cont.)

100 ppm for an 8-hour TWA. The STEL for xylene is currently set at 150 ppm.

### -EFFECTS OF OVEREXPOSURE:

SKIN: This material may cause defatting and irritation of skin. Prolonged or repeated contact may cause dermatitis.

INHALATION: Excessive exposure to vapors or spray mists can result in headache, dizziness, incoordination, nausea and loss of consciousness. Some reports have associated repeated and prolonged occupational overexposure to solvents with permanent brain and nervous system damage.

EYES: This material may be an eye irritant.

### -FIRST AID:

SKIN: Wash with soap and water immediately.

EYES: Flush with large quantities of water for 15 minutes and seek medical attention.

INGESTION: If ingested DO NOT induce vomiting, keep person warm, quiet, and get medical attention. Aspiration of material into lungs can cause chemical pneumonitis which can be fatal.

INHALATION: Remove victim to fresh air immediately. If coughing, difficult breathing or any other respiratory symptoms develop, seek medical attention at once.

### -PRIMARY ROUTE(S) OF ENTRY:

Inhalation.

Skin contact.

### -CARCINOGENICITY:

This product does not contain 0.1% or more of any substance which is listed as a carcinogen by IARC, NTP or OSHA.

## SECTION VI - REACTIVITY DATA

STABILITY: ☐ Unstable ☒ Stable

HAZARDOUS POLYMERIZATION: ☐ May occur ☒ Will not occur

### -INCOMPATIBILITY:

Avoid contact with strong oxidizing agents.

### -CONDITIONS TO AVOID:

Warm storage and ignition sources.

### -HAZARDOUS DECOMPOSITION PRODUCTS:

Incomplete combustion can yield carbon monoxide and toxic vapors.

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842899536

# MATERIAL SAFETY DATA SHEET

Information Telephone No. 800-874-5403

REICHOLD CHEMICALS, INC.

Coating Polymers & Resins Division

P. O. Box 13582

Research Triangle Park, NC 27709

ALL CHEMICAL EMERGENCIES

1-800-424-9300

Product Code: 14-635

Issue Date: 01/25/91

Page 1

## SECTION VII - SPILL OR LEAK PROCEDURES

### -STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:

Remove all sources of ignition. Ventilate area. Absorb spill with an absorbent material such as sawdust, vermiculite or sand and place material into a closed container. If large spill, dike area to prevent this material from entering water systems or sewers. Wear protective equipment during cleanup.

This material contains the following ingredients which, if spilled or released in quantities equal to or greater than the Reportable Quantity (RQ), are subject to the reporting requirements of CERCLA and/or SARA (40 CFR Parts 302 & 355):

Xylene RQ Value = 1000 lbs.

### -WASTE DISPOSAL METHOD:

This material has been tested and found to have a flash point below 140 degrees Fahrenheit. If discarded, this material and containers should be treated as hazardous wastes based on the characteristic of ignitability as defined under federal RCRA regulations (40 CFR 261). Disposal of this material or its container requires compliance with applicable labeling, packaging, and recordkeeping standards. Extreme care should be taken to ensure that it is disposed of only in a facility permitted for disposal of hazardous waste.

For further information, contact your state or local waste agency or the United States Environmental Protection Agency's RCRA hotline (1-800-424-9346 or 202-382-3000).

## SECTION VIII - SPECIAL PROTECTION INFORMATION

### -RESPIRATORY PROTECTION:

A canister-type respirator must be worn to prevent the inhalation of vapors or spray mists when the TLV or PEL is exceeded.

### -VENTILATION:

General ventilation is required during normal use.

Local ventilation may be required during certain operations to keep exposure level below the limits listed in Section II of this data sheet.

### -PROTECTIVE GLOVES:

Chemical-resistant nitrile, neoprene or rubber gloves required.

### -EYE PROTECTION:

Wear face shield or chemical goggles.

This information is furnished without warranty, representation inducement or license of any kind, except that is accurate to the best of Reichhold Chemicals, Inc. knowledge, or obtained from sources believed by Reichhold Chemicals, Inc. to be accurate, and Reichhold Chemicals, Inc. does not assume any legal responsibility for use or reliance upon same. Customers are encouraged to conduct their own tests. Before using any product, read its label.

842899537

# MATERIAL SAFETY DATA SHEET

Information Telephone No. 800-874-5403

REICHOLD CHEMICALS, INC.

Coating Polymers & Resins Division

P. O. Box 13582

Research Triangle Park, NC 27709

ALL CHEMICAL EMERGENCIES

1-800-424-9300

Product Code: 14-635

Issue Date: 01/25/91

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## SECTION VIII - SPECIAL PROTECTION INFORMATION (cont.)

### -OTHER PROTECTIVE EQUIPMENT:

Wear protective clothing to prevent skin contact.

Eye wash station and safety shower should be available.

## SECTION IX - SPECIAL PRECAUTIONS

### -PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING:

Avoid prolonged or repeated inhalation of heated vapors or spray mists. Keep away from heat or open flame. Avoid prolonged or repeated skin contact.

### -OTHER PRECAUTIONS:

None known.

## SECTION X - SUPPLEMENTAL INFORMATION

### -REGULATORY INFORMATION:

None.

### -SARA HAZARD CLASSIFICATION:

This material has been categorized as having the following hazard(s) as defined by SARA Title III regulations (40 CFR 370):  
acute, chronic, fire.

### -SARA SECTION 313 LISTED INGREDIENTS:

The following ingredients in this material are subject to the reporting requirements of section 313 of SARA and 40 CFR 372 [see Section II for percentage of ingredient(s)]:

Xylene (1330-20-7)

### -DOT PROPER SHIPPING NAME:

Resin solution

### -UN NUMBER:

UN1866

### -DOT HAZARD CLASS:

Flammable liquid

This information is furnished without warranty, representation inducement or license of any kind, except that is accurate to the best of Reichhold Chemicals, Inc. knowledge, or obtained from sources believed by Reichhold Chemicals, Inc. to be accurate, and Reichhold Chemicals, Inc. does not assume any legal responsibility for use or reliance upon same. Customers are encouraged to conduct their own tests. Before using any product, read its label.

842899538

**Reichhold Chemicals, Inc.**  
Coating Polymers & Resins Division  
400 Doremus Avenue  
Newark, NJ 07105

**REICHHOLD**

April 22, 1991

Office of Hazardous Substance Control  
Division of Water Resources  
P.O. Box 2809  
Trenton, N.J. 08625  
Attn.: Discharge Confirmation

Dear Sirs:

During the evening of April 2, 1991, approximately 1,600 gallons of N-Butyl Alcohol was released from an above ground storage tank at our facility located at the above address, and was reported by:

Robert Naujelis  
Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, N.J. 07105  
(201) 589-3709

Facility EPA ID Number: NJD092217892

The spill occurred as a result of over-filling of an above ground storage tank. The spilled material entered a cement diked area, and mixed with a synthetic resin material which had spilled two days earlier. The earlier resin spill was reported to the NJDEP and issued Case No. 91-4-1-1222-44.

Two tankwagon loads of N-Butyl Alcohol were to be delivered into the same tank. The storage capacity available in the tank was mistakenly calculated to be sufficient to accept the volume from both tankwagons. The first load was off-loaded. The second load was delivered while the operator tended to a third tankwagon. The spill went un-noticed until 9:00 a.m. on April 3rd, at which time it was reported to the NJDEP and other appropriate agencies.

Our cleanup contractor, Cambridge Chemical Cleaning Inc. was already on the scene tending to the previous spill. Cleanup operations continued on after the Newark Fire Dept. applied water to the spill in order to reduce the flash potential of the spilled alcohol.

The spill was reported to the following agencies, and was issued the corresponding case numbers:

1. New Jersey Dept. of Environmental Protection Case Number: 91-4-3-0950-03
2. National Response Center Case Number: 66345

(201) 589-3709  
(201) 817-9173 (Facsimile)

**842899539**

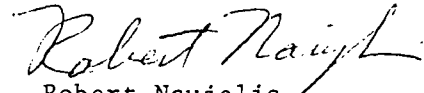


Page Two

To prevent this situation from occurring in the future, tank loading procedures have been revised. A copy is attached for your reference.

Please call me at the above listed telephone number if I can be of any further assistance in this matter.

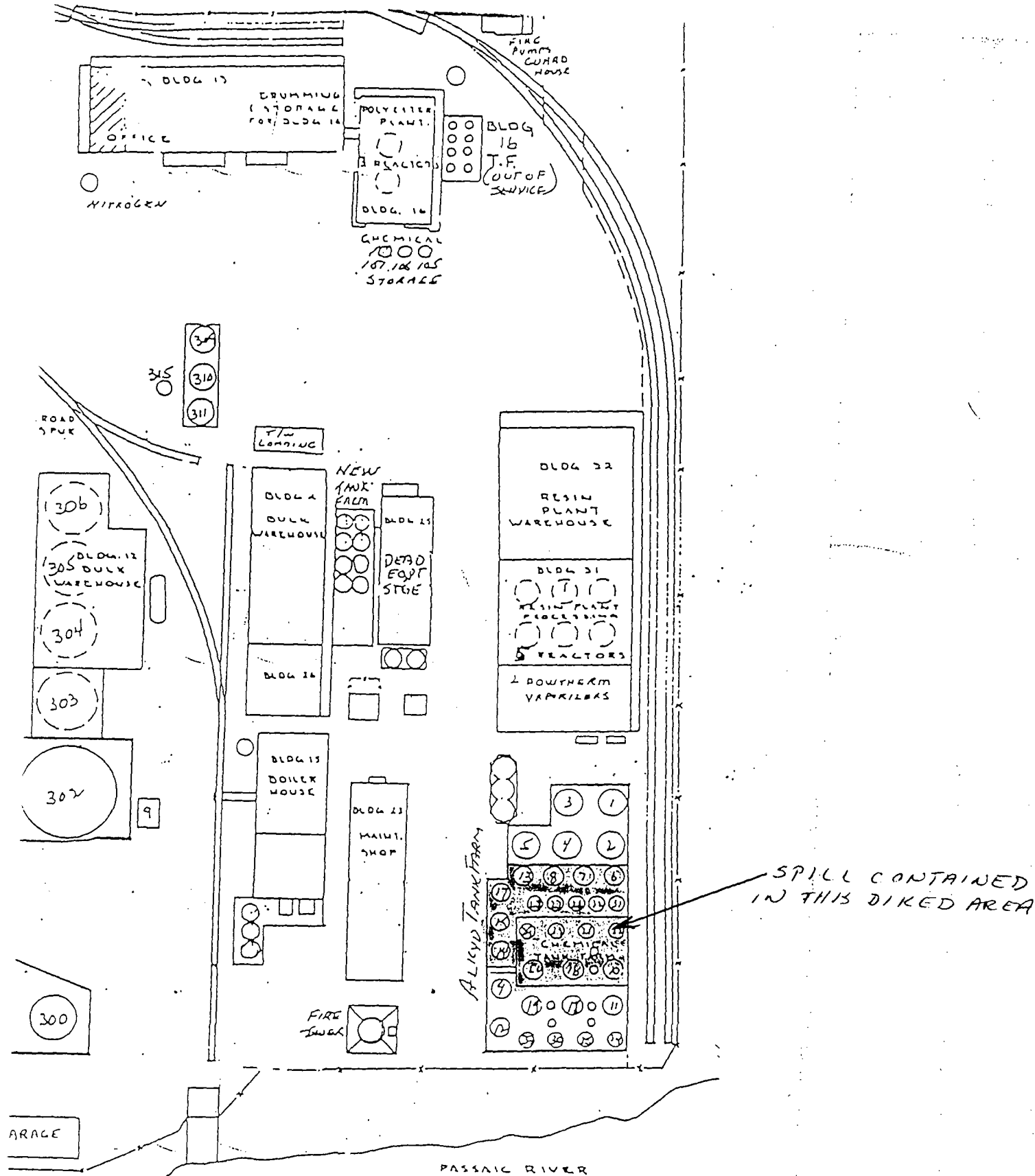
Very truly yours,

A handwritten signature in cursive script, appearing to read "Robert Naujelis".

Robert Naujelis  
Environmental & Safety Manager

RN/glm  
attachment

842899540



# **REICHHOLD**

400 Doremus Ave.  
Newark, N.J. 07105

842899541

interoffice communication

TO: All Employees

FROM: Art Dieffenbach

LOCATION: Newark


DATE: April 19, 1991

SUBJECT: RAW MATERIAL UNLOADING  
PROCEDURE

The following procedure must be followed each time a raw material is to be unloaded into a tank from either a tank truck or a tank car.

1. Information is to be recorded on the Raw Material Unloading log sheets.
2. Check available capacity of tank into which the product is to go. Check that the product is correct for that tank.
3. Gauge the volume of the tank truck or tank car.
4. If there is any question as to whether the material will fit into the tank, check with a supervisor before unloading.
5. Connect hoses and check that valves and pump lines go to the proper tank.
6. Make sure vehicle is bonded and grounded.
7. Begin unloading and check to make sure material is going into correct tank.
8. It is the truck driver's responsibility to check connections for leaks. Catch all leaks with proper containers.
9. A trained and authorized employee must be in the immediate area throughout the unloading process. That person must be aware of what is happening at all times and be capable of quickly and effectively responding to any problem which may occur.
10. The driver must stay with the truck at all times.
11. The unloader must periodically check the storage tank to ensure the product is flowing properly to the tank and that overflow does not occur.
12. After unloading, the driver must disconnect and walk all hoses into proper catch containers ensuring no product is lost onto the ground. The unloader must sign the log for each delivery.

If any questions, contact a supervisor.

  
A.E. Dieffenbach  
Plant Engineer

**842899543**

## BULK RAW MATERIAL UNLOADING LOG

[illegible]

**Reichhold Chemicals, Inc.**  
Coating Polymers & Resins Division  
400 Doremus Avenue  
Newark, NJ 07105

April 23, 1991

**REICHHOLD**

Office of Hazardous Substance Control  
Division of Water Resources  
P. O. Box 2809  
Trenton, New Jersey 08625

Dear Sirs:

During the afternoon of April 3, 1991, an estimated 20 pounds of a synthetic resin material was observed floating in the Passaic River directly behind our facility located at 400 Doremus Avenue in Newark, Essex County, New Jersey.

The spill was reported by Robert Naujelis at the above address. Facility EPA ID Number NJD092217892.

It is believed the material leaked from the bottom of a containment dike which was in the process of being cleaned of residues from two earlier spills. Reports on the earlier spills are enclosed.

An underground stream passes under the southeast corner of the dike and empties into the river. Material is believed to have leaked from the dike, into the stream and through the outfall into the river. Containment booms were placed around the outfall to prevent additional material from escaping.

When first discovered, the spill consisted of small patches of film on the surface of the water, spread over an area approximately one hundred yards in length and extending approximately 30 yards from shore. Clean Venture, Inc. was called in to remove the material from the water. Soon after the spill was observed, an onshore wind developed which pushed the spilled material back onto the shore, where it was removed and combined with material from the dike. By the time the Clean Venture boat arrived, the spill was cleaned by a crew which had arrived by truck.

The spill was reported to the following agencies and was issued the corresponding case numbers:

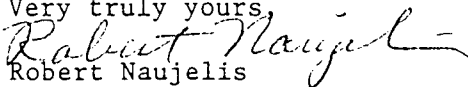
1. New Jersey Department of Environmental Protection, Case #91-4-3-1517-16
2. National Response Center, Case #66345
3. Newark Fire Department, Report #29803

The following corrective actions are being taken:

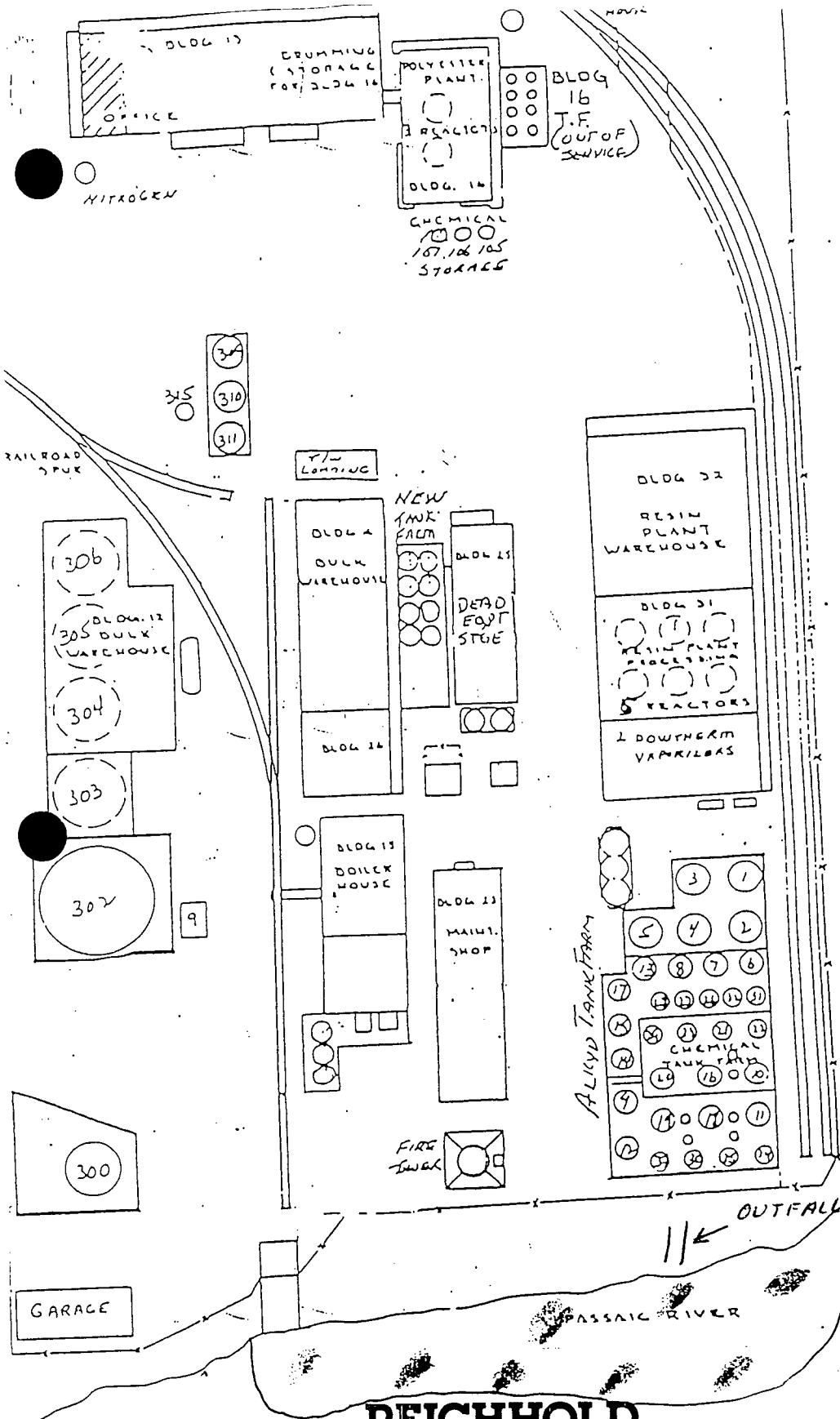
1. The diked area will be cleaned using a high pressure water stream.
2. An inspection/test of the dike will be made to determine where leakage might be occurring. Any cracks will be repaired and, if necessary, the dike coated with a sealant.

Any questions, please call me at 201-589-3709.

(201) 589-3709  
(201) 817-9173 (Facsimile)  
RN:cl

Very truly yours,  
  
Robert Naujelis  
Environmental & Safety Manager

842899544



SPILL APPEARED AS SMALL PATCHES, UNTIL BLOWN TO SHORE BY ON-SHORE WIND.

# REICHHOLD

400 Doremus Ave.  
Newark, N.J. 07105

842899546

DEP-062A  
10/91

New Jersey Department of Environmental Protection and Energy

☐ Check here if Revised Billing**ENFORCEMENT INVOICE**Document # \_\_\_\_\_  
Date Rec'd \_\_\_\_\_  
Amount \_\_\_\_\_DIVISION R.P.S.R.PROGRAM EMERGENCY RESPONSETYPE: ☐ Fine/Penalty ☒ Cost Recovery

FACILITY ID NO. \_\_\_\_\_

PROGRAM ID NO. 91-12-02-0923Case/Company Name Reichold ChemicalAddress 400 Doremus AvenueNewark, NJ 07101**Please identify appropriate category:**☐ County  
☐ Local  
☒ Private

Authority:

☐ Regional  
☐ Local☒ Industrial☐ Commercial☐ Other -

Specify

DATE ASSESSED	DESCRIPTION	AMOUNT
1/7/92	ADMINISTRATIVE COST RECOVERY	\$182.70
DATE DUE:	<u>January 27, 1992</u>	AMOUNT DUE: \$182.70

Make check payable to: **Treasurer, State of New Jersey**Mail to: **NJDEPE, Bureau of Revenue****CN 417, Trenton, N.J. 08625-0417**

COPY DISTRIBUTION: White - Remittance Copy Yellow - Company Pink - Bureau of Revenue Goldenrod - Division

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ROUTING AND APPROVAL TO:

NAME \_\_\_\_\_

DATE \_\_\_\_\_

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SUGGESTED  
VENDOR:  
Name, address  
and phone)

NT-DEPE,  
Bureau of Revenue  
CN-417, Trenton, NJ

SHIP TO

842899547

REQUISITIONER





**State of New Jersey  
Department of Environmental Protection and Energy**

Division of Responsible Party Site Remediation

Metro Regional Office  
2 Babcock Place  
West Orange, NJ 07052  
Tel. # 609-669-3955  
Fax. # 201-669-3993

Scott A. Welner  
Commissioner

Karl J. Delaney  
Director

December 31, 1991

Reichold Chemical  
400 Droemus Avenue  
Newark, NJ 07101  
Attn: Robert Naujelis

Dear Mr. Naujelis,

The New Jersey Department of Environmental Protection is authorized, pursuant to the New Jersey Spill Compensation and Control Act, N.J.S.A. 58:10-23.11 et seq. to collect all costs associated with a discharge and incurred by the State in the removal of hazardous substances or mitigation of damages. Accordingly, administrative cost (salary, materials and indirect costs,) in the amount of \$182.70 were incurred by the Department when the Bureau of Emergency Response responded to a overfill of a tank involving approximately 200 gals. of Alkyd resin on 12/2/91 in Newark, Essex County. DEPE case # 91-12-02-0923.

Payment of this amount will not relieve the company from potential liability for civil or administrative penalties, additional costs incurred by the Department, nor any other responsibility or obligation under the law, including responsibility for damages which may have been caused by the discharge incident. Your payment of this amount merely satisfies the Bureau's interest in recovering its actual costs of the above referenced response action.

Payment is due no later than 10 days after receipt of this letter. You may contact Walter Janicek of the Bureau of Emergency Response at (201) 669-3955 if you have any questions or require further information.

Very truly yours,

*Stanley J. Delikat*  
Stanley J. Delikat, Chief  
Bureau of Emergency Response

SJD/pr

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION AND ENERGY  
BUREAU OF EMERGENCY RESPONSE  
ADMINISTRATIVE COST RECOVERY WORK SHEET

PROJECT ACTIVITY # SVX

Case Name: Reichhold Chemical

CASE  
I.D.NO. 91-12-02-0923

COST CALCULATION: \$182.70

RESPONDER	DATE	REGULAR RATE	HOURS	AMOUNT	OVERTIME RATE	HOURS	AMOUNT
C. Gibbons	12/2/91	52.20	1.5	78.30	----	---	(Response)
C. Gibbons	12/2/91	52.20	2.0	104.40	----	---	(Report)
Total =				182.70			.

Equipment:

842899549

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION AND ENERGY  
BUREAU OF EMERGENCY RESPONSE  
ADMINISTRATIVE COST RECOVERY WORK SHEET

PROJECT ACTIVITY # SVX

Case Name: Reichhold Chemical

CASE  
I.D.NO. 91-12-02-0923

COST CALCULATION: \$182.70

RESPONDER	DATE	REGULAR RATE	HOURS	AMOUNT	OVERTIME RATE	HOURS	AMOUNT
C. Gibbons	12/2/91	52.20	1.5	78.30	----	---	(Response)
C. Gibbons	12/2/91	52.20	2.0	104.40	----	---	(Report)
Total =				182.70			

Equipment:

842899550

DEP-062A  
10/91

New Jersey Department of Environmental Protection and Energy

☐ Check here if Revised Billing**ENFORCEMENT INVOICE**Document # \_\_\_\_\_  
Date Rec'd \_\_\_\_\_  
Amount \_\_\_\_\_DIVISION R.P.S.R.PROGRAM EMERGENCY RESPONSETYPE: ☐ Fine/Penalty ☒ Cost Recovery

FACILITY ID NO. \_\_\_\_\_

PROGRAM ID NO. 91-12-02-0923Case/Company Name Reichold ChemicalAddress 400 Doremus AvenueNewark, NJ 07101**Please identify appropriate category:**

<input type="checkbox"/> County	Authority:	<input checked="" type="checkbox"/> Industrial
<input type="checkbox"/> Local	<input type="checkbox"/> Regional	<input type="checkbox"/> Commercial
<input checked="" type="checkbox"/> Private	<input type="checkbox"/> Local	<input type="checkbox"/> Other -

*Specify*

DATE ASSESSED	DESCRIPTION	AMOUNT
1/7/92	ADMINISTRATIVE COST RECOVERY	\$182.70
DATE DUE:	<u>January 27, 1992</u>	AMOUNT DUE: \$182.70

Make check payable to: Treasurer, State of New JerseyMail to: NJDEPE, Bureau of Revenue  
CN 417, Trenton, N.J. 08625-0417

COPY DISTRIBUTION: White - Remittance Copy Yellow - Company Pink - Bureau of Revenue Goldenrod - Division



**State of New Jersey  
Department of Environmental Protection and Energy**

Division of Responsible Party Site Remediation

Metro Regional Office

2 Babcock Place

West Orange, NJ 07052

Tel. # 609-669-3955

Fax. # 201-669-3993

Scott A. Welner  
Commissioner

Karl J. Delaney  
Director

December 31, 1991

Reichold Chemical  
400 Droemus Avenue  
Newark, NJ 07101  
Attn: Robert Naujelis

Dear Mr. Naujelis,

The New Jersey Department of Environmental Protection is authorized, pursuant to the New Jersey Spill Compensation and Control Act, N.J.S.A. 58:10-23.11 et seq. to collect all costs associated with a discharge and incurred by the State in the removal of hazardous substances or mitigation of damages. Accordingly, administrative cost (salary, materials and indirect costs,) in the amount of \$182.70 were incurred by the Department when the Bureau of Emergency Response responded to a overfill of a tank involving approximately 200 gals. of Alkyd resin on 12/2/91 in Newark, Essex County. DEPE case # 91-12-02-0923.

Payment of this amount will not relieve the company from potential liability for civil or administrative penalties, additional costs incurred by the Department, nor any other responsibility or obligation under the law, including responsibility for damages which may have been caused by the discharge incident. Your payment of this amount merely satisfies the Bureau's interest in recovering its actual costs of the above referenced response action.

Payment is due no later than 10 days after receipt of this letter. You may contact Walter Janicek of the Bureau of Emergency Response at (201) 669-3955 if you have any questions or require further information.

Very truly yours,

Stanley J. Delikat, Chief  
Bureau of Emergency Response

SJD/pr

**CCC CAMBRIDGE****Chemical Cleaning, Inc.**

ESTABLISHED 1948

O. Box 4220, 11 West 21st Street  
 Linden, New Jersey 07036  
 (201) 862-9363 Fax (201) 862-7818

**DAILY WORK SHEET**No. **2773**Start **8:00**Date **1-14-91 Monday**

Finish

 P.O.# **VERIBAL**  
**1917 DEFEINBACK**

**TANK CLEANING, REMOVAL & DISPOSAL**  
**N.J. STATE LICENSED HAZARDOUS WASTE HAULER**  
**HIGH PRESSURE WATER CLEANING**

CUSTOMER: BILL TO:

**Reichold Chemical****Doremus Ave****Newark N.J.****(908) 589-3709**

WORK DESCRIPTION:

**DO NECESSARY CLEANING OF RESIN SPILL AT REICHOOLD CHEMICAL DOREMUS AVE IN NEWARK**

WORK INSTRUCTIONS:

EMPLOYEE NAME	CLASS	HOURS		RATES			AMOUNT
		ST	OT	STRAIGHT	X1.5	X2	
<b>D.J. BROWN</b>	<b>Super</b>	<b>X</b>					
<b>S. Hooper</b>	<b>LABORER</b>	<b>X</b>					
<b>P. PAGAN</b>	<b>LABORER</b>	<b>X</b>					
<b>W. Johnson</b>	<b>LABORER</b>	<b>X</b>					
<b>C. Cromwell</b>	<b>LABORER</b>	<b>X</b>					
				<b>TOTAL LABOR</b>			

EQUIPMENT	HOURS	RATE	AMOUNT	MATERIAL	QTY.	UNIT PRICE	AMOUNT
<b>#4 p/v truck</b>	<b>7</b>						
<b>#1 p/v truck</b>	<b>7</b>						
<b>EQUIPMENT TOTAL</b>				<b>MATERIAL TOTAL</b>			

COMMENTS:

**TOTAL**

Customer Approved

**Fred Malczuk**

**CCC CAMBRIDGE**  
Chemical Cleaning, Inc.

ESTABLISHED 1948

P.O. Box 4220, 11 West 21st Street  
Linden, New Jersey 07036  
(201) 862-9363 Fax: (201) 862-7818

# DAILY WORK SHEET

No. 2777

Start 8<sup>00</sup>

Date 1-15-91 THURS

Finish

P.O.# VERRILL  
ART DUFFENBACH

## TANK CLEANING, REMOVAL & DISPOSAL N.J. STATE LICENSED HAZARDOUS WASTE HAULER HIGH PRESSURE WATER CLEANING

CUSTOMER: BILL TO:

Reichold Chemical

Doremus Ave

Newark N.J.

(908) 589 3709

WORK DESCRIPTION: Do NECESSARY SHOVELING AND CLEANING  
OF RESIN SPILL ON GROUND AT REICHOOLD CHEMICAL  
IN NEWARK

ON SITE WORK

WORK INSTRUCTIONS:

EMPLOYEE NAME	CLASS	HOURS		RATES			AMOUNT
		ST	OT	STRAIGHT	X1.5	X2	
D J BROWN	super.	8					
W Johnson	LABORER	8					
P PAGAN	LABORER	8					
				TOTAL LABOR ➡			

EQUIPMENT	HOURS	RATE	AMOUNT	MATERIAL	QTY.	UNIT PRICE	AMOUNT
#4 Pick-up	8						
EQUIPMENT TOTAL ➡				MATERIAL TOTAL ➡			

COMMENTS:

TOTAL ➡

Customer Approved

*Al Duffenbach*

842899555

**REICHHOLD®****PURCHASE ORDER**

THE EQUAL OPPORTUNITY CLAUSE IN SECTION 202 OF EXECUTIVE ORDER 11246, AS AMENDED, IS INCORPORATED AS PART OF THIS PURCHASE ORDER AND IF APPLICABLE, IS BINDING UPON VENDOR.

DIVISION <b>013 CPED</b>		RECEIVING POINT	CODE	VENDOR CODE	P/O NO. <b>146773</b>	SEQ #	P.O. DATE <b>1/14/91</b>
DIEFFENBACH		TO APPROVE INVOICE 1 - YES 2 - NO	REQUEST NO.	CONFIRMING TELEPHONE ORDER 1 - YES 2 - NO	CERT. OF ANALYSIS REQUIRED 1 - YES 2 - NO	SALES ORDER NO.	TAX % - WHEN EXEMPT SHOW NO. OR TAX AUTHORITY #
SHIP VIA		1 - DESTINATION 2 - SHIP PT. 3 - OTHER CODE (BELOW) P.O.B.		ALLOWABLE OVER %	SHIPMENT UNDER	TERMS	*ACKNOWLEDGMENT REQUIRED 1 - YES 2 - NO

COMPLETE ONE OF THESE BOXES.

☐ PURCHASE ORDER☐ SERVICE ORDER☐ BLANKET ORDER☐ BLANKET RELEASE

TO **CAMBRIDGE CHEMICAL CLEANING INC**  
**P O BOX 4220**  
**LINDEN NJ 07036**

SHIP TO AND  
**MAIL INVOICE TO:**  
**REICHHOLD CHEMICALS**  
**400 DOREMUS AVENUE**  
**NEWARK NJ 07105**

RESPONS. CODES 4 3 2 1	ACCOUNT NUMBER 4 3 2 1	SUB NUMBER 1 2 3 4 5 6 7 8	DESCRIPTION	AND	CATALOG NUMBER	COMMODITY CODE 1 2 3 4 5 6 7 8	ITEM NO.	QUANTITY 7 6 5 4 3 2 1	U/M 2 1	PRICE	U/M 2 1	DISC.
13	09	546	FURNISH LABOR AND EQUIPMENT NECESSARY TO CLEAN UP RESIN SPILL ON SECOND FLOOR OF BUILDING 31 AND SOUTH SIDE BLDG. 31.					1	JOB	\$1952.00		
<p><b>ORIGINAL ORDER</b></p> <p><i>13-1</i> <i>No 8</i> <i>Item 5</i></p>												

**MEMORANDA:**

PLEASE ENTER OUR ORDER IN ACCORDANCE WITH ALL CONDITIONS SHOWN. ADVISE AT ONCE OF ANY CHANGE. ON THE REVERSE SIDE ARE TERMS AND CONDITIONS TO WHICH THE SELLER AGREES BY ACCEPTANCE OF THIS ORDER. PLEASE RETURN ACKNOWLEDGMENT COPY AT ONCE.

DELIVERIES MUST BE MADE BETWEEN 8:00 A.M. AND 3:00 P.M. UNLESS OTHERWISE AUTHORIZED. PURCHASE ORDER NO., RELEASE NO. AND VENDOR NO. MUST APPEAR ON ALL INVOICES, PACKAGES, PACKING SLIPS OR CORRESPONDENCE PERTAINING TO THIS ORDER.

- Please acknowledge immediately with full delivery information.
- Each package shall be properly packed for shipment and shall be labeled with purchase order and stock numbers, weights and contents, and shall contain an itemized packing slip. Allow no charge for packing, crating, freight, express or cartage, unless specified on face hereof.
- Render invoices promptly and separately for each delivery; cover not more than one order on each, and show date of shipment and routing. Accompany invoice with original and copy of the bill of lading or comparable instrument. Seller's invoice shall state that all goods delivered hereunder will have been produced in compliance with the requirements of the Fair Labor Standards Act of 1938, as amended, and in all respects, comply with all applicable standards and regulations under the Occupational Safety and Health Act of 1970 (PL 91-596).

**MAIL INVOICE IN TRIPLICATE TO**  
**SAME AS "SHIP TO" ADDRESS**

THE SIGNER OF THE PURCHASE ORDER  
VERIFIES THAT A COPY OF A VALID MSDS  
IS ON FILE AT THE USING LOCATION.

BY: \_\_\_\_\_



## PURCHASE ORDER / REQUEST

# REICHHOLD®

P. R. DATE \_\_\_\_\_ **No. 189752**

**REQUESTER**

1. COMPLETE GRAY AREA.
2. FOLLOW INSTRUCTIONS IN PROCEDURE 64-002.

**COMPLETE ONE OF  
THESE BOXES**

- |                        |
|------------------------|
| PURCHASE ORDER REQUEST |
| SERVICE ORDER REQUEST  |
| BLANKET ORDER REQUEST  |
| BLANKET RELEASE        |

DIVISION CODE AND NAME <b>CND</b>		DEPARTMENT <b>NEWARK DIST</b>	RECEIVING POINT CODE <b>103</b>	VENDOR CODE	P.O. NO. <b>146773</b>	SEQ. NO.	P.O. DATE <b>1/14/90</b>
REQUESTOR'S NAME <b>ADIENTUBA</b>		TO APPROVE <b>YES 1 - NO 2</b>	REQUEST NO.	CONFIRMING SHIPMENT ORDER <b>2</b>	EST. OF ANALYSIS REQ. NO.	SALES ORDER NO.	TAX % WHEN EXEMPT SHOW NO. OR TAX AUTHORITY
SHIP VIA:		1 - DESTINATION 2 - SHPT PT. 3 - OTHER BELOW		CODE	ALLOWABLE SHIPMENT OVER % UNDER	TERMS	ACKNOWLEDGMENT RECEIVED BY <b>Z</b>

TO • CAMBRIDGE CHEMICAL COMPANY, INC  
PO BOX 4720  
LINDEN NJ 07036

SHIP TO

[illegible]

DELIVERY REQUESTED	NAME - VENDOR NO. 1	NAME - VENDOR NO. 2	NAME - VENDOR NO. 3
DELIVER TO	PRICE	PRICE	PRICE
APPROVAL	F. O. B.	F. O. B.	F. O. B.
APPROVAL	TERMS	TERMS	TERMS

**Reichhold Chemicals, Inc.**

Coating Polymers & Resins Division  
400 Doremus Avenue  
Newark, NJ 07105

*F-Doremus-waste water*

**REICHHOLD**

November 2, 1995

**VIA FAX AND CERTIFIED MAIL**

Mr. Donald Paterson  
Environmental Quality & Air Pollution Office  
New Jersey Department of Environmental Protection  
CN-0407  
401 East State Street  
Trenton, New Jersey 08625-0407

Mr. Byram Sullivan  
NJ Metro Regional Enforcement Office  
Environmental Quality & Air Pollution Office  
New Jersey Department of Environmental Protection  
2 Babcock Place  
West Orange, New Jersey 07052

Subject: Discharge Confirmation Report  
Case No. 95-10-3-0949-42  
Operator 24  
Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey  
APC ID No. 05010  
Stack No. 072

*4-21*  
*No 8*  
*item 6*

Dear Mr. Paterson and Mr. Sullivan:

This report is Reichhold's confirmation of a discharge that occurred on October 3, 1995. The report is formatted in accordance with N.J.A.C. 7:1E-5.8.

Item 1: Person who notified the NJDEPE:

Ronald C. Kurtz  
Manager Environmental, Health & Safety  
Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey 07105  
Phone #: (201) 465-2199

Item 2: Person who is submitting Confirmation Discharge Report.

Ronald C. Kurtz  
Manager Environmental, Health & Safety  
Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey 07105  
Phone #: (201) 465-2199

Tel: (201) 589-3709  
Fax: (201) 817-9173

**842899557**

Item 3: The person the Confirmation Discharge Report is being submitted on behalf of:

James E. Freeman  
Plant Manager  
Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey 07105  
Phone #: (201) 589-3709 ext. 183

Item 4: Person(s) responsible for the discharge.

Not Applicable

Item 5A: Owner and operator of the facility where discharge occurred.

Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey 07105  
Phone #: (201) 589-3709

Item 5B: Vessel or vehicle from which discharge occurred:

Tank 311 - 47,000 gallon Wastewater Storage Tank

Item 6: The source of the discharge:

An outside contractor was welding steel clips onto the top of Tank 311 near the manway at the North side of the tank. The clips were necessary for attaching a new tank ladder and railings. While the contractor was welding, sparks were created which ignited vapors in the tank. The tank's manway, as well as, the tank's over pressurization vent which had blown off and both had flames coming out. Flames were also coming out of the flame arrestor housing.

It was determined that the wastewater, which contains mostly water, had trace amounts of xylene, toluene, n-butyl alcohol, mineral spirits, linseed oil and soya oil present. A thorough Incident Investigation was conducted and the following conclusions were made:

1. Unsafe condition: Flammable vapors were present in the vapor space of the tank. This was probably created during the transferring of wastewater into the tank.
2. Unsafe Act: Wastewater containing trace amounts of flammable compounds was being transferred into the tank while welding was being performed on the tank.
3. Unsafe Condition: The tank's flame arrestor bank was either missing or destroyed during the event.
4. Unsafe Condition: The tank was not labeled with its contents and NFPA description
5. Unsafe Act: The Hot Work Permit Procedure was not properly utilized.

Item 7: The location of the discharge:

Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey 07105  
Tax Lot: 11  
Block #: 5070  
County: Essex  
EPA ID#: NJD092217892

See attached site map identifying where air discharge occurred.

Item 8: Common name and CAS No. for hazardous substance discharge:

Water (99% plus) 7732-18-5  
With trace amounts of  
Xylene 1330-20-7  
Toluene 108-88-3  
N-Butyl Alcohol 71-36-3  
Mineral Spirits 8052-41-3  
Linseed Oil 8001-26-1  
Soya Oil 8001-22-7

Item 9: A list of the hazardous quantities discharged:

Tank 311 was having wastewater transferred into the tank at the time of the incident. Based on process information and tank level prior and following the event. Reichhold estimates that the fire consumed the following: 15 lbs of xylene, 15 lbs of toluene, 36 lbs of mineral spirits, 7 lbs of n-butyl alcohol, and 56 lbs of oils (linseed & soya).

Item 10: Date and Time of discharge:

Date Discharge Began: 10/3/95 (Tuesday)  
Time Discharge Began: Approximately 9:00 AM  
Date Discharge Stopped: 10/3/95  
Time Discharge Stopped: Approximately 9:20 AM (Smoldered)  
Date Discharge Discovered: 10/3/95  
Time Discharge Discovered: Approximately 9:00 AM  
Date NJDEPE Notified: 10/3/95  
Time NJDEPE Notified: Approximately 9:45 AM

Item 11: Description of measures taken to control discharge:

Activation of a nitrogen sparge to the tank and the discontinuation of wastewater being transferred to the tank. In addition, the Newark Fire Department and the LEPC was also present on-site.

Item 12: Corrective Actions:

Plant personnel responded to the incident when it was announced over the public address system. The Newark Fire Department was summoned. Plant personnel activated a nitrogen sparge to the

tank and discontinued transferring wastewater into the tank. Smoke was coming out of the open tank top nozzles. The Newark Fire Department arrived on the scene approximately five minutes after the flash fire began. The amount of smoke coming from the tank had diminished. However, the tank top was hot and the Fire Department responded by hosing down the tank top with water for approximately five minutes.

Item 13: Preventative measures proposed to minimize the possibility of a reoccurrence.

The incident investigation team proposes the following Corrective/Preventative measures to be taken:

1. Educate workers that the facility's wastewater may contain flammable solvents.
2. Label the tank with the worst case scenario possible of the wastewater's composition.
3. Re-install the tank's flame arrestor bank, secure the manway, and install a leveling device.
4. Re-train employees in Lockout/Tagout procedures.
5. Re-train employees in Hot Work Permit Procedures.
6. Review existing operating procedures for the tank.

Item: 14 All entities involved in containment and cleanup:

A. Containment

Reichhold Chemicals Employees and Tank 311  
400 Doremus Avenue  
Newark, New Jersey 07105  
Phone #: (201) 589-3709

B. Cleanup

Not Applicable

C. Disposal

Not Applicable

Item 15: Samples of Discharge:

Not Applicable

Item 16: Results of sample Analysis:

Not Applicable

Item 17: Certification

Reichhold Chemicals, Inc. hereby certifies that the financial responsibility demonstrated pursuant to N.J.A.C. 7:1E-4.5 and submitted to the Department pursuant to N.J.A.C. 7:1E-4.4(a)9 is in full force and effect.

Item 18: Adjustment in quantity of release originally reported to spill hot line:

Not Applicable

Item 19: Additional Information:

Also present on-site was the Newark Fire Department and the LEPC. Based on the conditions of the fire, the facility's incident commander, Fire Department, and the LEPC decided not to put out the fire put to allow the fire to smother itself out. The only emergency action taken was the cooling of the tank by the Fire Department.

The Tank T-311 fire incident was an unforeseeable and unavoidable circumstance, due to process conditions at the time of the incident. Reichhold believes that there were no sufficient emissions resulting from the fire which would have exceeded permit limits. Reichhold is also providing this report to satisfy requirements of the Sinagra Bill (NJ Senate No. 1282).

Item 20: Certification:

I certify under penalty of the law that the information provided in this document is true, accurate and complete. I am aware that there are significant civil and criminal penalties, including fines or imprisonment or both, for submitting false, inaccurate, or incomplete information.

Should you require any additional information, please do not hesitate to contact at 201-465-2199.

Very truly yours,

REICHHOLD CHEMICAL, INC.



Ronald C. Kurtz  
Manager, Environmental  
Health & Safety

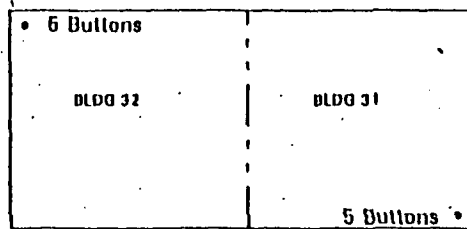
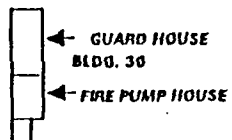
11-2njdep.ltr

cc: Jim Freeman  
Mike Baxi/Ken May  
Paul Brustofski/Louis Graham

842899561

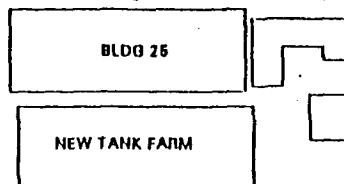
REICHOLD CHEMICALS INC.  
NEWARK PLANT

VOREM ST AVENUE

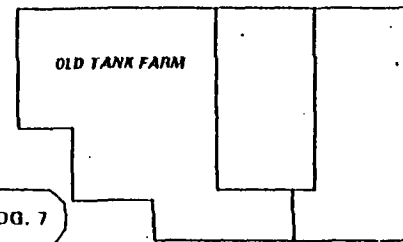
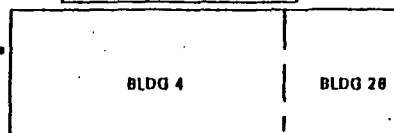


TRUCK SCALE

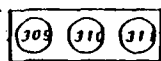
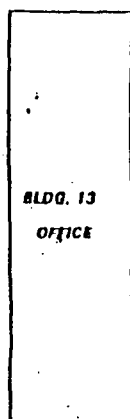
COOLING



T/W UNLOADING



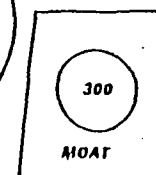
NEWARK BAY



Tank 310

• Emergency Alarm Buttons

BLDG 9



*Vick*

TO: N. Prato

FROM: K. Taylor *K. Taylor*

LOCATION: Newark

DATE: August 8, 1991

RE: MONTHLY REPORT  
JULY 1991

## I. SAFETY:

There was one reportable accident and two near misses, all of which occurred during the same incident. A supervisor and two warehousemen were sprayed with a solvent/resin mixture. The supervisor was splashed in the eye and required medical treatment. The other two employees were splashed, but not injured.

Hazwoper training for all Doremus and Albert Ave. employees has been scheduled for September 20th and 21st. Training will be given by the N.J. State Police

## II. ENVIRONMENTAL:

The following reports were submitted to government agencies on time: SARA Form R, P.V.S.C. MR-1 and MR-2, and the N.J. DMR Report.

Applied to N.J. DEP for air permits for R-3. Also applied for and received extension for R-4 to October 31st to perform stack tests.

Roof clean-up project was completed. However, we still need to stop on-going contamination, install new roof, and dispose of old roof. In addition, we removed seven above ground tanks and three loads of scrap metal to make room for E.C.R.A clean-up crews. Also, soil removal project was completed.

We had a fire in the filter cake roll off container, resulting from spontaneous combustion. The DEP and Fire Dept. were called to the scene. There were no Notice of Violations issued. A report is to be filed with the DEP, and corrective actions will be taken to prevent future occurrences.

We had a spill as a result of overfill in Tank-221. Approximately 100 gallons of a solvent mixture spilled onto the floor of Building 26. About 30 gallons spilled out of a doorway and onto the soil. The Fire Dept. and DEP both responded. There were no N.O.V.'s issued.



Correction actions are being taken to include employee education, spill containment, and overflow protection.

### III. SERVICE

One hundred eighty of 208 shipments were on time; of 28 late shipments, 16 were IPT's, all but 2 were same day shipment, and 1 customer order was late (outside of IPT's).

### IV. QUALITY

Two problem batches out of 52 produced. Amino start up difficulties, instrumentation problems, and lost butanol caused two batches of 27-580 to process low in N.V.

### V. BUSINESS

Number of batches produced at Doremus:	52
Number of blends:	15

Pounds produced in reactors:	2,232,094
Pounds produced in blends:	243,785
TOTAL POUNDS:	2,475,879

Reactor 4 (12 Batches)	339,820
------------------------	---------

Reactor Cycle time for July  
Actual hours: 1,245.7  
Standard hours: 1,099.5

115% of Standard

Doremus Avenue drummed 809,309 lbs. of material into 2023 drums. This represents 32% of production.

### VI. PURCHASING:

Supplier problems: Monsanto will discontinue production of RJ 100 at the end of 1991. This product is used in IS101. They have offered to produce and hold our 1992 requirements if we give them our volume. They will not offer a substitute.

Rhone Poulenc incorrectly stencilled the net weight on five drums of Alusec 591. Our plant people corrected the stencilling and a written complaint was sent to the supplier.

Vendor Visits: HOWARD HALL INT'L.- Reviewed acetanilide supply situation. Confirmed our requirement of 5000

RECEIVED 11 1991

D. Bright

Vicks

TO: N. Prato

FROM: K. Taylor

LOCATION: Newark (D)

DATE: Sept. 6, 1991

RE: NEWARK-DONEMUS  
MONTHLY REPORT  
AUGUST 1991

## I. SAFETY:

There were no employee accidents in the month of August.

We are currently halfway through R.C.R.A. training of all hourly employees, using B.N.A. series of 6 training videos followed up by specific training on housekeeping.

Hazwopper training will be carried out on September 13 and 14, 1991.

## II. ENVIRONMENTAL:

There were no reportable spills. However, there was a small fire on the roof of Building 31, apparently caused by spontaneous combustion. The Newark Fire Dept. and the N.J. DEP were called. The Fire Dept. responded after the fire was extinguished by in-house personnel. The DEP did not respond, since there was no release of hazardous material (other than smoke).

Final arrangements for E.C.R.A. project mobilization were made. Canonic, the clean-up contractor, was satisfied.

## III. SERVICE:

Tank wagon of Keltrol 1074 returned. Tank wagons still arriving late in afternoon- spoke with trucking. Nothing they can do about it. We must live with it. We will need to change our complex operation to meet their needs. (?)

Seventy-nine percent on time rating; as is. Higher without same day shipments, etc.

## IV. QUALITY:

The plant produced 2,803,000 lbs. of product, and worked

*Victory*

*D. Bright*  
*[Signature]*

TO: N. Prato

FROM: K. Taylor

LOCATION: Newark (1)

DATE: Oct. 4, 1991

RE: NEWARK-DUREMUS  
MONTHLY REPORT  
SEPTEMBER 1991

## I. SAFETY:

There were no lost time accidents during the month. However, there was one reportable accident, as Harold Englert received cuts and scrapes on his leg and knee.

All but two employees received Hazwoper Training to awareness level.

Most of the production employees have completed 5 weeks of training on waste handling, as required under R.C.R.A., as well as training on housekeeping.

## II. ENVIRONMENTAL:

There was one spill of 50 gallons of 16-432 resin on Sept. 19, 1991, and it was reported to the NJDEP.

The N.J. Dept. of Health conducted an inspection on 9/19, to determine compliance with N.J. Right-to-Know Law. Notices of violation (N.O.V.) to be issued for missing U.A.S. numbers on above ground tanks and bulk fill lines. No monetary fines are expected.

N.J. DEP R.C.R.A. inspection on 9/25. There were 6 N.O.V.s quoted, but no written response as yet. The 2 most serious violations include mis-labelling of drums, and storage of hazardous waste in unregistered tank. This inspection was requested by U.S. EPA (according to D.E.P.E.).

P.V.S.C. inspection of Doremus Avenue pH and L.E.L. charts on 9/25. pH outages were noted by P.V.S.C. They were informed of agreement not to cite Reichhold, so long as wastewater pH treatment equipment installation stays on schedule.

## III. SERVICE:

The plant produced a total of 2,685,091 pounds.

842899566

# REICHHOLD

## interoffice communication

TO: All Employees

FROM: K. Taylor

cc: D. Bright  
N. Prato  
V. Will

LOCATION: Newark

DATE: July 26, 1991

SUBJECT: FILTER CAKE ROLL OFF FIRE

*1108*  
*1 Kem S*

Commendations are in order for Bill Leveille, Sam Jones, Mike Baxi, and Bob Naujelis for responding quickly and effectively to a roll off fire.

On July 25, 1991, at 5:30 p.m., the filter cake roll off was discovered smoldering. After an initial attempt to put the fire out was unsuccessful, the fire department was called and the plant notified.

The fire dept., hazardous materials unit, and DEP all arrived to help. The fire department sprayed foam on the roll off twice.

The water and foam were sampled and pumped into a nearby process water tank wagon. The water will be transferred and treated in the OCPSF unit.

Thanks to Art, Miles, Tom Sturm, Reggie Cain, Ron Lukowitz, Greg Terracciano, Bruce Williams, and everyone else who helped to hold the fort down while the mess was cleaned up.

In the future, we will need to steam strip the filter cake, blow solvent through the filter press (especially important when bodied oils are filtered), set off the fire alarm immediately upon discovering a fire or smoldering materials; send someone up to greet the fire dept. and direct them to the scene, and prepare and train everyone on every shift how to respond to emergencies.

KT/glm

*K. Taylor*

842899567

TO: J. Freeman

FROM: K. May

cc: R. Arnott

LOCATION: Newark-Doremus

M. Baxi

DATE: September 12, 1994

M. Gasparik

E. Lau

Members Acc. Inv. Team:

SUBJECT: Accident Investigation  
Report - Filtercake  
Dumpster Fire

J. Flynn

S. Matos

#### SUMMARY:

On Friday September 9, 1994 at 3:20 AM, the Filtercake Dumpster at the Newark-Doremus plant caught fire. The Newark Fire Dept. responded and put out the fire within 10 minutes. There were no injuries or environmental incidents. The rented Dumpster will need a new cover and a fresh coat of paint. Spontaneous combustion due to linseed/soya contaminated rags is suspected as the primary cause. Corrective actions which are underway will be based on this cause.

#### INCIDENT STATEMENT:

Please refer to the DETAILED LIST OF SEQUENTIAL EVENTS in the first attachment. A few additional notes are posted below:

- \* In New Jersey, the filtercake waste is profiled as a hazardous waste.
- \* The Filtercake Dumpster is remotely located about 200 feet from the Bldgs. #31/32 production area and 200 feet from the Bldg. #13 office area.
- \* The dumping of filtercake had been restricted to a few individuals who had been trained in the procedures for handling filtercake waste. The Dumpster had been operated per procedure. The last dumping had occurred about 48 hours prior to the fire.
- \* As far as can be determined, there were no foreign chemicals thrown into the Dumpster during the 48 hours preceding the fire. The cover was on the Dumpster without any sign of tampering. The rags and alkyd filter cartridges were not discovered when they were charged into the Dumpster.
- \* Mineral spirits was used to rinsed the filterpresses; therefore, the filtercake may have contained residual combustible solvent. The cartridges, which are only used to filter alkyds, always contain solvents, some which may have been flammable.

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Heon 9

- \* The filter cartridges were burnt the most, but then they would have been the most combustible material in the Dumpster. Since there were no rags near the cartridges, they are not considered a source of combustion. They may have fueled the fire, however.

#### CAUSAL STATEMENT:

Spontaneous Combustion is suspected because no foreign oxidizers, catalysts or reducing agents were found in the dumpster during clean-out. The filtercake is created from the press filtration of Oil intermediates, not alkyds, at this time. Boiled Linseed, which is the most dangerous of the spontaneous combustion products, is bag filtered. There weren't any filterbags in the Dumpster. This leads to two possible spontaneous combustion sources:

1. Spontaneous combustion from oil contaminated rags which either ignited the mineral spirits in the filtercake or the solvent in the cartridges, or
2. Spontaneous combustion of linseed oils in the filtercake which ignited the residual solvent.

Lack of proper training, inadequate procedures, and lack of safety awareness also have to be considered contributing causes. While the few individuals trained by EHS were loading the Dumpster properly, little accommodation had been made to account for the type of waste inside the drums that were being transferred into the Dumpster. Since the filtercake drums had been accumulated a few weeks in advance of the receipt of the Dumpster, the rags and cartridges were probably tossed in with the filtercake in advance of any proper training.

#### RECOMMENDATIONS:

- \* Develop complete SOPs not only for loading and maintaining the Dumpster, but also for correctly loading only the correct materials into the drums at the satellite station (press room). Conduct all required training.

EHS resp. by 9/30/94

- \* Develop alternative disposal methods as needed for oily rags and filter cartridges (steam or caustic clean?).

EHS/Operations resp. by 9/30/94

- \* Discontinue use of Dumpster until a safe and compliant disposal procedure can be developed, if feasible. Use drum disposal instead. Such improvements forwarded by the Accident Investigation Team were:

- Burning Dumpster to comply with NJ hazardous waste regs.
- Use a metal or other non-combustible top for the Dumpster.
- Consider providing a sprinkler system, manual or automatic activation.

EHS/Plant Eng. resp. by 10/15/94

\* Upgrade fire response capabilities:

- Provide wrenches for fire hydrants.
- Consider reforming fire brigade with proper training in 1995.
- Check current firefighting inventory and condition, replace missing components and label storage places.
- Conduct fire extinguisher training, especially on portable dry chemical units.
- Install monthly inspections of large fire equipment.

EHS/Plt. Mgmt. resp., action plan by 11/1/94

\* Write SOP for press operations addressing rinsing of press filters.

EHS/Operations by 9/30/94

DETAILED LIST OF SEQUENTIAL EVENTS

NEWARK-DOREMUS FILTERCAKE DUMPSTER FIRE - 09/09/94

<u>TIME</u>	<u>EVENT</u>
0320	Security Guard Angel Cruz and Utility Man Charley Wallace notice flames in Dumpster. Newark Fire Dept. is summoned through call to 911.
0321-0329	Supervisor John Flynn is contacted. Notification is made to Control Room. No evacuation is ordered due to remoteness of Dumpster. Calls are made to Plant Operations Manager Mick Gasparik and EHS Manager Ken May. J. Flynn and S. Matos attempt to use 200 ft. fire hose, but there is no toll to open hydrant.
0330	Newark Fire Dept. Engine Co. No. 5 arrives under the direction of Deputy Fire Chief Pierce. Dumpster fire is put out within ten minutes. Spray of filtercake on ground is kept to a minimum. Contaminated water is kept in Dumpster (Filtercake is listed as a hazardous waste).
0345	Ken May arrives, surveys damage, and talks with Deputy Fire Chief. Top of filtercake is burnt. Flames were highest (3-4 ft.) when rubber covering was consumed by the blaze. All is secure, but fire water has gone down stormwater system. Further inspection does not show any evidence that any filtercake or organic contamination in the water has discharged into the stormwater sewer. Since there is no evidence of discharge, the decision is made to not call the NJ-DEPE.
0410	Newark Fire Dept. leaves site. K. May begins interviews for accident investigation.
0415	Booms and pads are put around the two nearest stormwater sewers to prevent any contaminated water discharge. Samples are taken and they are generally clear. Cleanup begins (filtercake on ground is swept to within two feet of Dumpster).
0430	M. Gasparik arrives and is appraised of the situation. Spontaneous combustion is main suspected cause.
0445	In a coincidental incident, the fire mainline near the LEL meter house ruptures flooding the Dumpster

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area. A sinkhole forms. Flood washes into stormwater sewers, but does not approach Dumpster or any filtercake on the ground.

- 0600 Fire line break is isolated. There is enough daylight to permit an inspection of the Dumpster. Oily rags and filter cartridges used in solvent based alkyd filtering are discovered.
- 0630 American Industrial Marine Services (AIMS) is contacted to clean Dumpster and put waste into drums.
- 0830-1600 AIMS completed cleanup into drums. Samples of residue are taken. Flashpoint of cake is 155 F.
- 1230 Per recommendation of Corporate Environmental, a call was placed to NJ-DEPE (Case No. 94-0-9-1230-27). The inspector stated that a call did not have to be made since there was not any actual discharge from the Dumpster.

REICHOLD CHEMICALS  
NEWARK PLANT

← GUARD HOUSE  
BLDG. 30  
← FIRE PUMP HOUSE

BLDG 31/32

TRUCK SCALE

OLD TANK FARM

BLDG. 7

COOLING  
TOWER

BLDG 25

NEW TANK FARM

MAINTENANCE  
BUILDING 23

WATER  
TANK

Filtercake  
Dumpster  
(30 cu. yd)

T/W UNLOADING

BLDG 4

BLDG 26

BLDG. 13  
OFFICE

309 310 311

BLDG 9

PAD

90 FT. DIA. PAD

300

MOAT

BLDG  
14

NEWARK BAY

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RCI Newark - Doremus Avenue, NJ Facility  
**Accident Investigation**

**APPENDIX B**

**ACCIDENT INVESTIGATION CHECKLIST**

Personnel Involved

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Unsafe Acts/Practices	X	—	—
Lack of Safety Awareness	X	—	—
Lack of Proper Training	X	—	—
Judgment Factor	—	—	X
Lack of Experience	X	—	—
Not Following Procedure/Practice <i>No Full SOP</i>	—	X	—
Acceptance of Unsafe Practice/Condition	—	X	—
Lack of Supervision	—	—	—
Other _____	—	—	—
Not a Factor	—	—	—

Procedure

Adequate for the Job	—	X	—
Understood by Employees	—	X	—
Available	—	X	—
Reviewed Routinely with employee	—	X	—

Operating Conditions

Normal, Routine Operations	X	—	—
Non-Routine Operations	—	X	—
Abnormal Situation	—	X	—
Employee-Created Unsafe Condition	X	X	—
Work Environment Unsafe Condition	—	X	—
Weather Related Unsafe Condition	—	X	—

Equipment or Facility

Unrecognized Hazard	—	X	—
Recognized Hazard, Inadequate Action	X	—	—
Design Factor	X	—	—
Installation Factor	X	—	—
Improper Use of Equipment/Facility	—	X	—
Inadequate Equipment/Facility	—	X	—
Insufficient Equipment/Facility	—	X	—
Equipment Failure	—	X	—

**REICHOLD CHEMICALS, INC.  
UNUSUAL CIRCUMSTANCE REPORT**

TO: Mick Gasparik, Site Manager

Date of Incident:

September 9, 1994

cc: Ken May, EHS MANAGER  
Nick Prato, Nwk Ops Mgr.

Time of Incident:

3:20 am

Location:

Filter Cake Dumpster

Process:

Waste Storage

Description of event: Fire in Filter Cake Dumpster was put out by Newark Fire Dept.

Evacuation not required, but area kept clear while fire was put out by 3:40 am

( arrived at 3:30 am).

Action Taken: Storm drains were dammed up to prevent Filter Cake runoff. Ensuing fire

water main break (4:15 am), did not flush filtercake into storm drains. Accident

investigation required. Linseed rag spontaneous combustion suspected. NJ-DEPE was

otified of incident. Case No. 94-9-9-1230-27 was assigned, but the DEPE recorder did not  
consider the incident a discharge.

Reported by: K. May, Angel Cruz, John Flynn

UCR TO BE COMPLETED PRIOR TO THE END OF THE DAY!

Further actions:

Incidental event, no additional investigation needed: ☐ Yes ☒ No

Additional investigation required: ☒ Yes ☐ No

Referred to: ☒ Accident Investigation Committee

☐ Production

☐ Technical/Quality

☐ Maintenance

☐ Other \_\_\_\_\_

Approval:

K. R. May *KRM*

Date:

September 9, 1994

Time:

6:00 am

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## PLAYERS LIST

AETC After hours

201-691-7352

OHM EMERGENCY

800-537-9540

Pete Barry

- Human Resources type
- RCI

Mike Bowers

- Investigator/engineer
- Forensics Engineering
- Contact regarding the investigation into cause.
- 404-952-4764 W
- 404-591-1912 H
- Atlanta, GA

Steve Brechbiel

- Corporate Communications
- RCI
- Community issues

David Caldwell

- Attorney
- Ellis, Woods and Lamping

Jim Chang

- On scene coordinator for RCI
- RCI
- Contact for all issues relating to the response operation.
- 201-589-3709 W NJ
- 201-690-5500 H NJ
- 919-990-7918 W NC

- 919-676-9566 H NC

John D. Cleary

- Field Representative
- Cronin and Associates
- Counting all items leaving the building.
- 201-912-8999 W
- 201-912-9119 Fax
- 201-596-7978 Beeper
- 201-765-9751 H
- Manhattan, NY

Robert Cosselman

- Civil Engineer
- O'Brien and Gere
- Examining structural issues relating to the building.
- 315-437-6100 W
- 315-463-7554 Fax
- Syracuse, NY

Art Diffenbach

- Facility Engineer
- RCI

George Drahos

- Safety Analyst
- Hoechst Celanese
- 201-589-4371

Bill Ellis

- Attorney
- Ellis, Woods and Lamping
- Coordinating investigation and follow actions. Contact regarding agency visits and actions.
- 513-852-6067 W
- 513-852-6000 W
- 513-852-6087 Fax
- 513-231-1663 H

- Cincinnati, OH

Joe Feyti

- Director of Emergency Response
- OHM
- Contact for OHM problems in North East
- 609-987-0010 W
- 609-421-7515 PGR
- 609-987-8860 Fax
- 800-537-9540 Emergency
- 609-298-4621 H

Al Fisher

- Manager, Safety and Environmental Control
- Otis Elevators
- Safety oversight for Otis repairs
- 212-567-5700
- Manhattan, NY

Charlie Fitzsimmons  
Angel Rodriguez  
Joe Cosentino  
Dilshad Pereru

- On Scene Coordinators
- US EPA, Region II
- CERCLA, CWA and other environmental compliance during emergencies.
- 908-906-6983
- Edison, NJ

Timothy J. Gerdeman

- National Accounts Director
- OHM
- Contact regarding OH issues.
- 800-562-2953
- 908-407-8666 Car
- 609-243-7297 FAX
- Princeton, NJ

Alane Grey

- Paralegal
- RCI
- Contact re: document control, general legal issues.
- 919-990-7864 W
- 919-990-7707 Fax
- 919-387-8578 H

Kris Hoffman

- Compliance Health and Safety Officer
- Industrial Hygiene
- OSHA Region 2
- Investigating the accident.
- 201-263-1003 W
- 201-299-7161 Fax
- Parsippany, NJ

Richard Johnsen

- Director of Special Services
- AETC
- Will handle T119
- Flanders, NJ
- 201-347-7111

Walter Johnson

- Industrial Hygienist
- RCI
- Newark Plant Contact

Fred Malchuck

- Maintenance Supervisor
- RCI

Mike Marshall

- Civil Engineer/PETROSEP Specialist
- OSH HQ
- Investigating the accident.



- 202-523-8259
- 202-523-6599 FAX
- Washington, DC

**Brien McMahon**

- Project Manager
- OHM Corporation
- 609-443-2800
- 609-426-8928 Fax
- 609-869-8963 Pager
- Winsdor, NJ

**Gayle McMorrow**

- Plant Human Resources
- RCI
- Newark

**John Mnych**

- Construction Manager
- O'Brien and Gere
- 908-225-7380 W
- 201-491-0526 Kearny Site
- 908-954-3140 Pgr
- 908-225-7931 Fax

**National Car Rental  
Newark Airport**

- 622-1270
- 344-1430 Contracts

**Bob Naugelis**

- Environmental Engineer
- RCI
- Plant Contact regarding environmental agency contacts (USEPA, NJDEP) environmental consequences, TSDF issues.

**OBG Trailer**

- 201-589-0013
- 201-589-0205 FAX/Phone

**OHM Trailer**

- 201-578-8634

OHM Windsor

- 800-634-5147

Patent Scaffolding

- William Varetoni
- Sales

- 201-824-8512

Julie Polley

- Risk Manager
- RCI
- Controls the IRI types
- RTP

Mike Richter

- Corporate Health and Safety
- AETC
- 215-588-6334 H
- 201-347-7111 W

Kevin Ritter

- Reactive Chemicals Group Manager
- AETC
- Lead peroxide removal effort
- 201-347-7111
- 201-691-7359 Fax
- Flanders, NJ

Jerry Rounds

- Site Supervisor
- OHM
- 609-421-7524 Pager
- 908-521-5043 H

Kent Taylor

- Plant Manager
- RCI
- Contact for all facility issues.
- 201-589-3709 W
- 201-817-9173 Fax
- 201-857-3202 H
- Newark, NJ

**Chialing Ting**

- Civil Engineer
- Weston TAT (Region II EPA TAT)
- Representative for Charley Fitzsimmons
- 201-225-6116
- 201-225-7037 FAX

**Bob Vandenberg**

- Site Supervisor
- OHM
- Backup supervisor for Jerry Rounds
- At Kearnie (BASF)

**William Varetoni**

- Sales Manager
- Patent Scaffolding
- Scaffolding/shoring vendor.
- 201-824-8512
- 201-643-4911 FAX
- Newark, NJ

**Bob Verdon**

- Technical Sales Rep.
- AETC
- General contact for AETC.
- 201-347-7111 W
- 201-627-6699 H
- 908-719-0403 Beeper

- 201-691-7359 Fax

Neil Wilkinson

- Site Safety Officer
- O'Brien and Gere
- Site safety for all RCI personnel and visitors desiring to enter B/31-32 site.
- 609-936-9366 H
- 908-225-7380 W
- 908-407-8634 CAR

Vicky Will

- Former Environmental Engineer
- RCI
- Corporate Contact regarding environmental agency contacts (USEPA, NJDEP) environmental consequences, TSDF issues.
- Call at Mallinkrodt at Raleigh

Dave Wilson

- Corporate Health and Safety
- O'Brien and Gere
- 315-437-6100 x2376
- Syracuse

Miscellaneous people

Randy Arnott

Dave Bright

Jo-Anne Campbell

- 919-990-8005 W
- 919-556-3869 H

Dick Foss

Al Vickers

AGENDA ITEMS:

Agency Visits

OSHA (Kris Hoffman and Mike Marshall) at 0900; 1/17/92  
US EPA/NJ DEP? at 1000 hours; 1/17/92

Priority

ACM pickup outside building  
Remove Chrysler drums

Request quals packages  
question can ohm use rci's master service agreement with ohm  
vicks status  
sample r2, t119 for mike bowers and osha  
retrieve manway cover  
clear window frames  
status fire protectoin system. feasbility of divison valve and  
replace heads.  
sweep up alley way  
pickup acm outside building.  
visit 2 and 3  
inspect barriers  
tape areas on fl 5

no entry signes  
copy of OHSA tape  
call bufallo labs (452 lb) samples otw  
alane; list of players and how to handle  
bill; meet and discuss  
call otis and discus elevator  
look for asme stamps on t119 and t125  
look at venting on t119  
ask jabc if labs have an accelerating rate calorimeter  
call nick prato  
laborers to clean chrysler drums  
sample from elbow area,  
# and type of rupture disk  
is vent clogged  
look for sheared bolts, pressure gauge  
t119 sample to albert avenue

ohm to talk with art and kent  
begin inventory drums  
police area  
shsp tomorrow

obg on site at 0830  
osha on site at 9am

get silver shield gloves  
saranex

epa on site at 10 am

9am monday am meeting

report from art on electrical to fl1 for dowtherm

vicky

tsdfs for materials

pvsd for water runoff

order lanterns

decon scba

inventoy numbers

mt drum removal

tw removal

remove debris on roof

obg hs plan

chco level

oh decon of obg personnel

tearoffs for msa ultravue

obg support on weekend

name at guard gate

oh employee names

keys for office

police call for acm only on 4 and 5

purchase order number to ohm (alane)

sample of everything that osha gets

retains for all samples

arnie mohar is to send (fax to mike);

structural survey (alane will send over)

bill to provide long term plans

camera (stills) (mike will send point and shoot)

for 1/19

change plane tickets

call walter

call cronin, bring tags

call eftaxes to remove boxes and stage 5 trailer

sweeper for parking area

underfloor area, move items

water leak in boiler

move tables and chairs to trailer, telephone  
questions to r & d

what happens coils break in t119  
phone number to guard  
memo to guard re: entrants  
need aetc workplan  
guard for other gate  
write reports  
players list  
form to sign from OBG re: visitors release of liability  
get OTIS out on site  
defrost procedures  
rohm and hass for analytical  
get arolon formula from alane  
dowtherm msds  
find out who owns the backhoe  
arolon formula to bob v aetc  
need arolon 559 formula asap  
call frank tubbs, iri  
questin to bill: g&a on per diem  
obg hasp

deadlines:

Wednesday: workplan to EPA  
0750 conference call  
0900 meet with contractors

AETC  
need hasp  
workplan  
mfr contacts

Crane idea

yes - no - why  
time to implement

vs elevator

\$50K  
2 weeks

1/21  
mobilize aetc  
call ohm-brian

call bridgeville to cancel  
call steve brechbiel  
hoechst celanese plant manager visit  
call cronin re: computer  
write to patrick spelman canonie c/o site re: blast  
call fed ex  
call mike bowers

call alane re: fed ex package  
call phil gunter  
kent can go to course in windsor  
call randy at 1130  
followup-2 telephone lines in trailer  
retrive whell vent under ladder (right)

1/22

fire department notification  
kent to notify hoechst celanese and sunoco  
kent to call alane  
retrieve parts  
call cronin re: fifth box  
vacumn files and computer  
retrieve valves.

1/27

litebox ordered?  
talk to julie directly  
call AETC re: t119

1/28

start cleanup and removal of tmp  
aetc on site at 0800  
look for MEHQ and phenophy  
epa tat on site at 0900  
otis elevators  
construction debris into rolloff  
move valve to upstairs  
call cronin  
aetc to remove material on wednesday  
scaffolding in by tuesday pm  
move scaffolding materials into the building  
vac elevator pit  
vac standing water  
pick up asbestos  
call laura re: plane tickets  
formaldehyde drager tubes  
call joanne campbell  
find plastic bags  
move crz  
call michael bowers re: valve and fed ex package  
call federal express  
waste disposal question - segregate chlorendic  
IRI pays for waste disposal?

1/29



bob aston in pm  
dinner with ohm and obg  
camera to mike bowers  
wet dry vacuum?  
aetc on site at 0800  
lightbox in fed ex  
meet at 1330  
samples to buffalo  
print phase ii proposal  
print players list  
call tim regarding course  
conference call at 0830  
samples of valve  
fedex samples to buffalo  
fedex camera  
box for stuff

1/30

osha (kris) in  
otis on site  
dave caldwell in  
pack ppe

1/31

brief bob and kent  
adios

## TECHNICAL SPECIFICATION FOR BUILDING 31/32 SITE RESTORATION

### Site Work at Doremus Avenue:

Phase I:           Emergency Response  
Phase II:          Building 31/32 Site Restoration  
Phase III:         Demobilization

### Scope of Work:

Phase I:           Majority complete by February 7.

Establishment of a spring structure roof.

Assessment of building damage and cost estimates for restoration/demolition. [Need a decision.]

Phase II:          Building 31/32 Site Restoration

#### Tier I Activities

- Restoration of the freight elevator or installation of an external elevator. [Assuming not done in Phase I.]
- Establishment of string lighting systems throughout the building.
- Removal of hanging debris (window frames). [All floors and both buildings. Use air chisels, debris removed to inside of building.]
- Demolition of compromised portions of the curtain wall.
- Removal of loose/disturbed ACM.
- Complete salvage/removal of finished product and rework drums from 31-1 and 32-1. [Decon drums by wet wiping.]
- Removal of raw materials from 31-1. [Decon bulk bags by HEPA vacuuming.]
- Reestablishment of the building floor drain system. Power snake, etc. Replacement of damage piping and drains. [If not feasible,

DRAFT FOR DISCUSSION -- 1

consider sealing openings to minimize inter-floor transmission of fluid.]

- Continued removal of contaminated water from pits, floors, etc.

#### Tier II Activities

- Asbestos abatement. [Cost recovery?]

[Evaluate facility status downgrade to permit Level D, minimal restriction entry by site staff.]

- Product removal from reaction vessels. [Material to fuel blending.]
- Bulk raw material removal from storage tanks. [Material to drums/tank wagons for possible reuse.]
- Drain down all piping systems. [Material to fuel blending.]
- Internal debris removal -- hazardous and non-hazardous. [Includes approximately 4-5 yd<sup>3</sup> of organic acids, n.o.s., from 32-4 and 32-3.]
- Rig and remove T125 for forensics analysis. [Optional - check with Mike Bowers for necessity.]
- Gross decontamination of the floor slabs and walls. [Vacuums, lasers, shot blast.]
- Decon roadways and adjacent buildings.
- Decon facility and process sewers.
- External debris removal (e.g., window frames and glass). [General laborers.]

#### Tier III Activities

- Roof demolition [B/32, portions of B/31].

#### Phase III: Demobilization

- Contractor wrap up.
- Punch list.

#### Phase X: Restoration of chemical processing capability.

- Equipment replacement.
- Restore fire protection systems.
- Upgrade material handling systems.
- Process automation.
- Secondary containment areas.
- etc.
  
- or -

Demolition by general contractor.

- OHM/??? to provide spot hazardous materials decontamination capability.
- Scavenge equipment.

TECHNICAL SPECIFICATIONS (from OBG)

- Up Front Statement of Work (approximately 3 paragraphs).
- OBG General Provisions
- Technical Specifications:
  - Building Decontamination [How clean is clean?]
  - ACM removal.
  - Waste disposal.
- Payment Items:
  - Lump sum for Initial Activities
  - Lump sum for Decontamination
  - Unit price for transportation (non-hazardous waste)
  - Unit price for transportation (hazardous waste)
  - Unit price for disposal (non-hazardous waste)
  - Unit price for disposal (hazardous waste)
  - Unit price for asbestos removal:
    - < 12 inch diameter piping
    - > 12 inch diameter piping
    - linear foot
- Unit price for asbestos disposal

phaseii

last edit: 1/28/92

## ACTIVITY LOG and NOTES

Tuesday -- January 14, 1992

- Notified at approximately 10AM, RCI needs additional on-site coordination assistance at Newark.

Concerned about progress to date, lack of trained personnel on site.

Discussed insurance considerations, RTP staff presumptions about site.

- Notified that OHM will be on-site at 1300 hours. Verified personnel to attend, requested EOD support.

OHM cannot do asbestos abatements.

- Called AETC (201-347-7111) and requested attendance at 1300 hours meeting. Rosemary Jaretsky, Wayne Dulsiewicz.

- Flight 447 -- RDU - EWR

Arrive at 2200 hours.

- Known issues:

- Support investigation
- Peroxides
- >BG on HNu
- Fire protection OOS
- OSHA on-site
- Textron ECRA activities (Canonie)
- Structural damage

- Plan of attack:

- |                           |                         |
|---------------------------|-------------------------|
| - Site assessment         | - J. Chang              |
|                           | - Consultants           |
|                           | - ER                    |
|                           | - Structural            |
| - Peroxide removal        | - Assess                |
|                           | - Bid                   |
|                           | - SHSP/Work plans       |
|                           | - Site Prep             |
|                           | - Remove                |
|                           | - Manufacturer Contacts |
|                           | - Agency Notifications  |
| - Other immediate hazards |                         |

- Forensics
- Structural Assessment
- Remove Hazardous Materials
  - Floors 1, 2, 3, 4, 5
  - Reactors
  - Bulk tanks
- IRI
  - Restore fire protection systems
- Decontaminate site
- Remediate/restore
- No PCBs on site (K. Taylor).
- Expenses
  - Lodging
  - Sodas \$5.00
  - Snack \$3.50

Wednesday -- January 15, 1992

T = 24 F

W = 14 MPH, Gust to 25 MPH

- Met Mike Bowers (Forensics Engineers), Dave Caldwell (Ellis, Woods and Lamping) and Alane Grey (RCI) for breakfast briefing.
- Forensics priorities (Bowers)
  - Document.
  - Remove pieces.
  - Samples.
  - Followup on ???
- OSHA on-site at 0930.
- Hazard communication briefings given to all players by Walter Johnson.
- Inventoried Vick Bernal's wallet. Transferred items for pickup by family. (Alane)
- CISD for employees. (Pete Barry) Union meetings with Alane and Pete.
- Confirmed with Jo-Anne Campbell that butyl acrylate --> poly butyl acrylate. Higher molecular weight would indicate less

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toxicity.

Mix of different molecular weight polymers.

- Initiate physical inventory. Very slow progress.
- Snow loading: 30 lbs/cubic foot. (Mike Sanders).
- Talked to Dick Foss about molecular weight distribution and other analyses.

Dick believes charge of 452 lbs of Vazo 64 is a massive excess.

- Walk through Fl. 5, B/31 with Walter Johnson and Kris Hoffman, OSHA. Level C entry: 2x tyvek, overboots, OV/HEPA, hardhats, gloves.

Found:

31-5

- ACM in stairway. Minor resin contamination.
- Broken sprinkler piping.
- Little fire in overall area. Lots of fire/heat near passenger elevator area.
- 2 Forklifts OOS. Both EE.
- 8-12 MT Chlorendic anhydride drums.
- 4 bulged ethylhexyl acrylate drums.
- Sprinkler piping broken in vicinity of T125.
- T125 displaced several feet. Vessel leaning against wall.
- Area well ventilated.
- No soot in elevator shaft.
- 32 Butyl acrylate drums. Full?
- 31 Eastman DMCD drums. One known leaker.
- Heater in area. Gas or steam?
- 11 BMA drums. Check.
- Melted super sack of ? material.
- B/31-32 fire wall intact.
- No access to B/32 on Fl. 5.
- Fire in hot room. Wall bowed inward. Door destroyed and blown inward.
- Pump room collapsed inward.
- Extensive ACM pieces on floor.
- 8 Automax valves on pallet on floor.
- Roof section cantilevered upward.
- Structural column supporting condensor possibly compromised.
- 32-5 inaccessible.

Miscellaneous

- Boilers on in B/31.
- Power off. Locked and tagged. (Fred Malchuk)



- Steam runs through 2nd floor. Discussing whether this is a hazard. (Fred Malchuk)
- Plant evacuation horns operative. (Maintenance)
- Monomer tank farm piping (NPG?) line break due to window frame shrapnel.
- Water from roof will back up into 31-2.
- OBG personnel: Neil Wilkinson and John Mnych.
- OSHA debriefing. Mike Marshall will be returning to site. Walter Johnson and Kris Hoffman agree to exchange video tapes.

Equipment should be removed. Disconnect transfer line flange valve.

- Inventoried Building 9 (peroxide storage).
  - 9 50 lb Vazo 64 drums.
  - 1 100 lb paraformaldehyde drum.
  - 18 100 lb di-t-butyl peroxide drums
  - 1 425 lb Luperox 500T drum (dicumyl peroxide drum)
- Hosted contractor briefing at 1000 hours. AETC and OHM participated. Discussed broad scope of work and showed OBG video tape. Approximately 12 persons.
- Briefed Randy Arnott. Told not to hold back. OHM was unhappy.
- Wrote up statement of work and contractor requirements.

Thursday -- January 16, 1992

- OBG Project Management, Structural and Corporate Health and Safety AOS.
  - Structural assessment of building.
- OBG work crew on site.
  - Barricaded immediate area with drums and sandbags.
  - Assist in removal of parts.
  - Draft SHSP.
- Host another contractor tour
- OBG provides backup support for agency (EPA, OSHA) tours and forensics data gathering visits.

Friday -- January 17, 1992

- Immediate items: T119 tank, bulged drums and peroxides.
- Bob Verdon (AETC), Bob Naugelis and Vicky Will discuss waste

- disposal options.
- Ron Hovey (OBG) is the OBG on-site project manager covering for Don Stone.
- No permit needed for on-site stabilization of peroxides (Vicky Will).
- US EPA OSCs visit site. Bob Naugelis and Vicky Will provide information and host in office.
  - Escort for site visit through 31-5, 31-4 and 32-4. Due to lack of logistical support, tour stops without seeing Fl. 1, 2, or 3.
- Mike Marshall and Kris Hoffman (OSHA) on site. (Tom Sturm and Kent Taylor). Questions about:
  - Vazo 64 reaction with butyl acrylate. Addition procedures.
  - What would happen if mixture sits for a long time.
  - Cold room temperature.

Saturday -- January 18, 1992

Sunday -- January 19, 1992

- Found 4 bolts (3 nuts attached, 1 next to bolt) from ??? on the stiffening ring on T125.
- Found 1 bolt on the floor adjacent to T125.
- Found 1 partial bolt fragement in the 31-5 stairwell.
- OHM Activities:
  - Bob Vandenberg, Supervisor
  - Finished loading 2 box trailers (see list).
  - Staged drums for further load out.
  - Cleared stairwells of debris. Lighting on stairwell landing for floors 1, 2 and 3.
  - Glass swept up and drummed.
  - Rolloffs expected in tomorrow.
- Discussed difficulties in obtaining laboratory support from Dick Foss with Jo-Anne Campbell. She agrees to assist. Suggests Roy Williams as very familiar with the Arolon series.

Monday -- January 20, 1992

- Conference Call: 0800 with AFV, Dan Uyesato, Julie Polley and others. No consensus on how to proceed. Julie indicates IRI is satisfied with informaiton to date. Extreme level of

concern with documentation and cost recovery considerations.

- Meeting with OHM, AETC, OBG at 0900.
  - Briefed on manlift/crane idea. No major problems.
  - AETC proposes that a path be cleared to the room. Remove tettering blow out panel. Use telescoping boom lift to get access to area. Rubble would be excavated manually. Containers removed to a bomb bucket and covered with a bomb blanket. The bucket is attached to a pallet. The pallet is moved using a blast shielded pallet jack. The pallet is placed on the manlift and the manlift lowered remotely. When near the ground, the manlift is rotated to place the load in front of the bunker. A forklift with blast shield is used to transfer the material from the manlift into the bunker. The containers are then remotely opened, stabilized, and resealed.
  - Alternate plan involves using a crane to lift out the drums. Much riskier due to need to work on top of the pile.
  - Requested informal statement of work and costs from AETC.
  - Requested 500 100-lb. sandbags from Delores.
- OTIS elevator representative on site. Strategy: see penthouse first, if there is major damage then probably not worth doing anything. Floor by floor inspection. Need access to pit (probably flooded). Need to ride elevator through the building to certify.
- Do not submit anything to EPA. Dave Bright and OBG to do.
- Retrieved an HP printer from the shipping office. Released to Harry Kathari. Notified Cronin of movement.
- Obtained 2 1-gallon samples from T119. Harry Kathari sent to RCI-Dover for analysis.
- OHM agrees to discount manhours from today forward 20%. Brien and Kevin McMahon will no longer be billed.
- OHM activities (7 man crew, 4 RT, 3 office).
  - Load one box trailer approximately 3/4's full. Clean and stage drums.
  - Remove sill and portions of brick on 32-5 window.
  - Clear and light stairwells.
  - First floor windows are removed.
  - Cleared path to the peroxide room.
- OBG to reveiw HASPs for consistency (OHM, OBG, AETC).
- Called Federal Express and Forensic Engineering regarding

their camera being destroyed in transit.

- Cataloged potential forensic data.
- Dinner with Tim Gertleman and Joe Feyti (OHM).

Tuesday -- January 21, 1992

- Briefed Steve Brechbiel on peroxide detonation possibility. Not concerned.
- OHM on site. 11 man crew (8 RTs, 3 office).
  - Cleared brick work from window.
  - Finished loading fifth trailer.
  - Hilti powder tool class.
  - Blocked elevator shaft in 31-1, 31-2, 31-3, 31-4, and 31-5.
  - Relocated trailers to fence line.
  - Moved debris from in front of B/32.
  - OHM agrees to 10% markup on AETC (vs. 15%).
  - OHM will issue a purchase order for the peroxide removal only. Treatment and disposal will be handled separately.
- Met with Patton Scaffolding re: 20K shoring systems.
  - No engineering support just supply installation information and check RCI/OBG numbers.
  - Need structural input on issues:
    - Support at columns only or mid-span loads also.
    - Ability of floor to take the load.
    - Need to clear extensive areas to install the shoring.
    - Is it acceptable to use air-shores or other temporary means to stabilize the roof while the permanent (20K) shores are installed?
    - Support for 31-5 condensor column.
- John Cleary (Cronin) on site to count drums.
  - Need copies of bills of lading.
- AETC to be onsite tomorrow.
  - Advised AETC that T&D services are not guaranteed despite the letter statement.
  - Still haven't seen structural report or HASP from OBG.
- Reviewed OBG letter to US EPA concerning workplan. Comments to Dave Bright. Argued for stronger more proactive letter vs. non-committal letter.

- Mike Bowers (Forensic Engineering) send camera to Radisson. Video areas when sun is on the other side. Send Buffalo samples back to laboratory.
- Retrieved the Protectoseal vent from 31-5.
- NEXT
  - OHM to bring in manlift, tape off the fifth floor.
  - AETC to be onsite at 0700 to attend site safety briefing and setup.

Wednesday -- January 22, 1992

Resolve OHM conflicts

AETC setup for peroxide removal  
Remove 6 drums

Thursday -- January 23, 1992

Raining

Remove remainder of drums

Friday -- January 24, 1992

Address

Saturday -- January 25, 1992

No activity.

Sunday -- January 26, 1992

No activity.

Monday -- January 27, 1992

Tuesday -- January 28, 1992

Wednesday -- January 29, 1992

AETC does site setup for T119 draining.  
Stpped due to OHM liability questioins

Thursday -- January 30, 1992

No significant activity  
Otis Elevator safety person onsite  
string power to the elevator

Friday -- January 31, 1992

Drained T119 contents into a tank wagon  
Received shipment of scaffolding  
Temporary power to the elevator

Left site at 1645.

actsum  
last edit: 2/8/92

## OHM Notes for Stabilization of 32-5

Goal: To shore B/32 roof and effect hazardous material removal concurrently.

Notes:

- Roof is unstable and subject to collapse without warning.
- Roof is no longer weather-tight resulting in potentially continuous water entry into the area during rain and snow events.
- Materials contained in 32-5 include: paraformaldehyde, chlorendic anhydride and various organic acids. The condition of the material varies between:
  - intact containers (<10%);
  - container integrity breached and material spilled onto floor and potentially mobile (<85%);
  - material fused (via heat or self reaction) to the floor (<5%).

*(My estimates.)*

- There is substantial evidence that materials have already migrated from the 5th floor through the 4th, 3rd and 2nd floors.
- Status of the freight elevator is unknown.

Rationale: Shoring of the roof is necessary to stabilize the building/site situation.

Shoring will require movement of significant amounts of the material to gain access to the area around the columns.

A simultaneous material removal plan/shoring effort will effect both actions without the necessity for double handling (and double man-hour expenditure) of the material.

Once the roof is stabilized, this will permit the addition of a watertight barrier on the roof to prevent further migration of rain/snow waters. Failure to seal the roof can result in generation of potentially infinite quantities of contaminated water (hazardous waste) and further contamination of the lower floor.

Additionally, failure to control water entering the building greatly increases the chance of off-site migration of materials and regulatory agency involvement.

Costs:                    -    **\$4,000/day, estimated duration = 10 days**

                         -    \$3,200/day -- labor

                         -    \$ 600/day -- subcontractors (crane rental, diesel fuel, etc.)

                         -    \$ 150/day -- field purchases

                         -    \$ 50/day -- contingency

                         -----

                         \$4,000/day            -- OHM Corporation

                         -    \$2,100/month            -- Shoring rental (5,000 ft2)

                         \$ 600                    -- delivery charge for shoring materials

                         -    \$1,000/month            -- 30 yd3 hazardous roll-off bin rental (two bins)

                         \$ 45/bin                -- Liner

                         \$ 300                    -- Initial spotting fee

Total project cost:

-    \$40,000    OHM

-    \$ 2,700    Shoring rental

-    \$ 1,345    Roll-off bins rental

Comments:            Cost estimates assume:

-    immediate startup (i.e., no mobilization/demobilization costs);

-    waste disposal can be expedited (no prolonged holding times); and

-    demolition of the roof will proceed, once the 32-5 area has been stabilized.

Cost estimates do not include waste disposal charges. Bob Naugelis is researching this activity.



page 3  
January 27, 1992  
OHM Proposal Notes

Prepared by: Jim Chang, RCI  
Jerry Rounds, OHM  
Brien McMahon, OHM  
John Mnych, OBG

1/27/92

doc 32-5  
last edit 1/27/92

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REICHHOLD

5 copies to  
Ken

interoffice communication

TO: K. Taylor  
cc: R. Aston  
V. Karode  
R. Naujelis

Jim  
CIRC: Walter

FBI

Platz

FROM: A. Dieffenbach  
F. Malczuk  
LOCATION: Newark-Doremus  
DATE: February 19, 1992  
SUBJECT:

The following is a listing of apparent structural damage observed to date. We have not completed a damage assessment of the entire building 31/32 or the rest of the property as yet. We feel that this preliminary assessment should be reported quickly, and additional damages noted on subsequent inspections reported later.

A. External Inspection from Ground

1. Windows Bldg. 31/32
  - a. Fifth floor - all windows missing
  - b. Fourth floor - all windows on North, South, and East sides are missing. Windows on west side damaged.
  - c. Third floor - all windows on North and South sides missing or damaged. Both windows on West side damaged and two windows on East side damaged.
  - d. Second floor - All windows missing or damaged North and South sides. Both windows on West side damaged.
  - e. First floor - All windows on West, North, and South sides damaged.
2. Crack at Bldg. 32 West side at Southwest corner.
3. Several cracks on South side at Southwest corner.
4. Crack on South side fifth floor window up to roof line and down towards 4th floor.
5. Smoke and fire damage to brick on 5th floor South side.
6. Severe cracks passenger elevator shaft South side.
7. Crack around duct opening South side Bldg. 32 5th floor.
8. Overhead doors Bldg. 31 missing or damaged all floors on South side.
9. Crack Bldg. 31 East side at NE corner, 4th to 3rd floor.

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10. Crack on North side NE corner 5th floor.
11. External window curtain sprinklers damaged on NE and West walls.
12. Parapet wall badly cracked and leaning North side.
13. Fire damage to brick work at windows on North side.
14. Crack at 3rd floor window North side Bldg. 32.
15. Crack at 5th floor North side NW corner.
16. Overhead steel roll up door at DT vaporizer room damaged.
17. Parapet wall on roof between Bldg. 31 and 32 buckled.
18. Bldg. 31 roof cracked and lifted.
19. Bldg. 32 roof cracked and lifted.
20. Crack on East side Bldg. 31 fourth floor stairways at top of window.
21. Crack South side Bldg. 31 at stairway.
22. Expansion joint South side Bldg. 31/32 extruded
23. Bldg. 32 West side, North window brick spalled in three (3) places.
24. NW corner RR canopy support cracked.
25. North side Bldg. 31/32 joint - canopy support cracked and building cracked.
26. Stairwell skylights damaged Bldg. 31 and Bldg. 32.
27. Skylight damaged, freight elevator motor room.

B. Bldg. 31 - 5th Floor Inspection

1. Hot room overhead door demolished.
2. Hot room wall buckled.
3. Pump room wall demolished.
4. Doors to smoke tower and stairway bend and sprung.

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Memo to K. Taylor  
February 19, 1992

5. Overhead fire door between Bldg. 31 and 32 damaged.
6. Personnel fire door to Bldg. 31 damaged.
7. Inside hot room ceiling and roof damage.
8. Personnel door to hot room demolished
9. Roof lifted over hot room and pump room.
10. Pump room window sill shifted.
11. Interior wall North side of pump room buckled.
12. Window sills West and North walls all shifted.
13. East wall cracks at columns on both sides of windows.
14. Column at NE side cracked across top and down.
15. North side wall columns behind T35/36 vertical cracks on both sides of window opening at wall.
16. Roof lifted off support beams R-2, R-4, R-3, R-1, T42, T39.
17. North wall behind R-1 packed column pushed out approximately 4 inches from building column.
18. Roof beams at R-1/R-3 area appear warped.
19. North wall at NW corner of bldg. pushed away from column.
20. Cracks in beam (concrete) East/west beam at NE corner of T77.
21. Cracks in concrete on beams East and West sides of R-5.
22. Crack in concrete on beam at roof line West side R-5.
23. South building wall at passenger elevator buckled outward approximately 1½ inches from columns.

NOTE: COULD NOT EVALUATE BUILDING DAMAGE ON SOUTH WALL OF BUILDING 31 DUE TO STICKINESS OF RESIN. WE WILL PLAN TO DO THIS LATER.

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Memo to K. Taylor  
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C. Bldg. 32 - 5th Floor

1. Peroxide room wall demolished.
2. Peroxide room door demolished.
3. Freight elevator door missing.
4. Sample container storage room wall demolished.
5. Peroxide room roof vent damaged.
6. Window sills on North and South side of building shifted.
7. Wall above freight elevator door fire damaged.
8. Attached is a numbering plan for building columns. Column damage is listed according to the numbering.
  - A-1 Not accessible.
  - A-2 Not accessible.
  - A-3 Cap damaged. Column and cap cracked West side.
  - A-4 Fire and smoke damage. Horizontal crack at beam line around column.
  - A-5 Cap damaged. Horizontal and vertical cracks in column.
  - A-6 Smoke damage. Wall cracked away from column.
  - A-7 Chip off cap. Fire damage. Expansion joint damaged.
  - B-1 Column and cap cracked.
  - B-2 Column cracked 1 to 4 feet above floor. Cap smoke damaged.
  - B-3 Cap damaged. Cracked around column at cap.
  - B-4 Cap approximately 1/3rd gone - column damaged.
  - B-5 Cap approximately 3/4ths gone - column damaged.
  - B-6 Cap damaged column spalled and damaged.
  - B-7 Cap damaged, column spalled. Expansion joint damaged.
  - C-1 Not accessible.

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Memo to K. Taylor  
February 19, 1992

C-2 Column spalled - cap damaged  
C-3 Cap approximately 2/3rds gone. Column spalled and cracked.  
C-4 Same as C-3  
C-5 Same as C-3  
C-6 Cap gone, column cracked at cap line.  
C-7 Cap damaged. Column concrete fire damaged.  
D-1 Not accessible.  
D-2 Cap cracked. Column fire damaged.  
D-3 Cap cracked. Column fire damaged.  
D-4 Cap gone. Column fire damaged and cracked.  
D-5 Cap gone. Column badly damaged.  
D-6 Cap gone. Column re-bars exposed severely damaged.  
D-7 Cap damaged. Concrete broken away both sides of column.  
E-1 Not accessible.  
E-2 Column fire spalled.  
E-3 Cap damaged. Column fire damaged and cracked.  
E-4 Cap gone. Column fire damaged and cracked.  
E-5 Cap gone. Serious damage to column.  
E-6 Serious damage to cap and column.  
E-7 Serious damage to cap and column. Expansion joint damage.  
F-1 Not accessible.  
F-2 Some fire damage.  
F-3 Some fire damage. Column cracked 3 feet above floor level.  
F-4 Cap badly damaged. Column concrete spalled.

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Memo to K. Taylor  
February 19, 1992

- F-5 Cap badly damaged. Column concrete spalled.
- F-6 Same as F-5.
- F-7 Corner of cap missing. Column cracked at cap.
- G-1 Not accessible.
- G-2 Brick wall cracked away from column.
- G-3 Cracked about 6 feet up. Brick wall cracked away from column.
- G-4 Column spalled - cap damaged.
- G-5 Column spalled - cap damaged.
- G-6 Column spalled - cap damaged.
- G-7 Column spalled at top.

D. Bldg. 32 - 4th Floor

1. Window sill NW corner shifted. Window missing.
2. Smoke tower and stairway doors sprung.
3. Ceiling cracks NW corner and tank farm area.
4. Support beam cracked above window NW corner.
5. Window sill shifted SW corner, brick pulling away.
6. West side window sills shifted.
7. Inside wall first course tile broken - supervisor's locker room.
8. Crack by column at doorway to supervisor's locker room.
9. Cement missing from block joint left side of doorway supervisor's locker room.
10. Elevator (freight) door bowed inward.

Note that there appears to be at least two areas of severe damage that we do not believe was known until now. These are items 17 and 23 on Building 31 - 5th floor listing. We plan to make an additional tour of these areas in order to

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Page Seven  
Memo to K. Taylor  
February 19, 1992

finalize damage assessment as well as inspect the remainder of building 31/32  
and all buildings on the site.

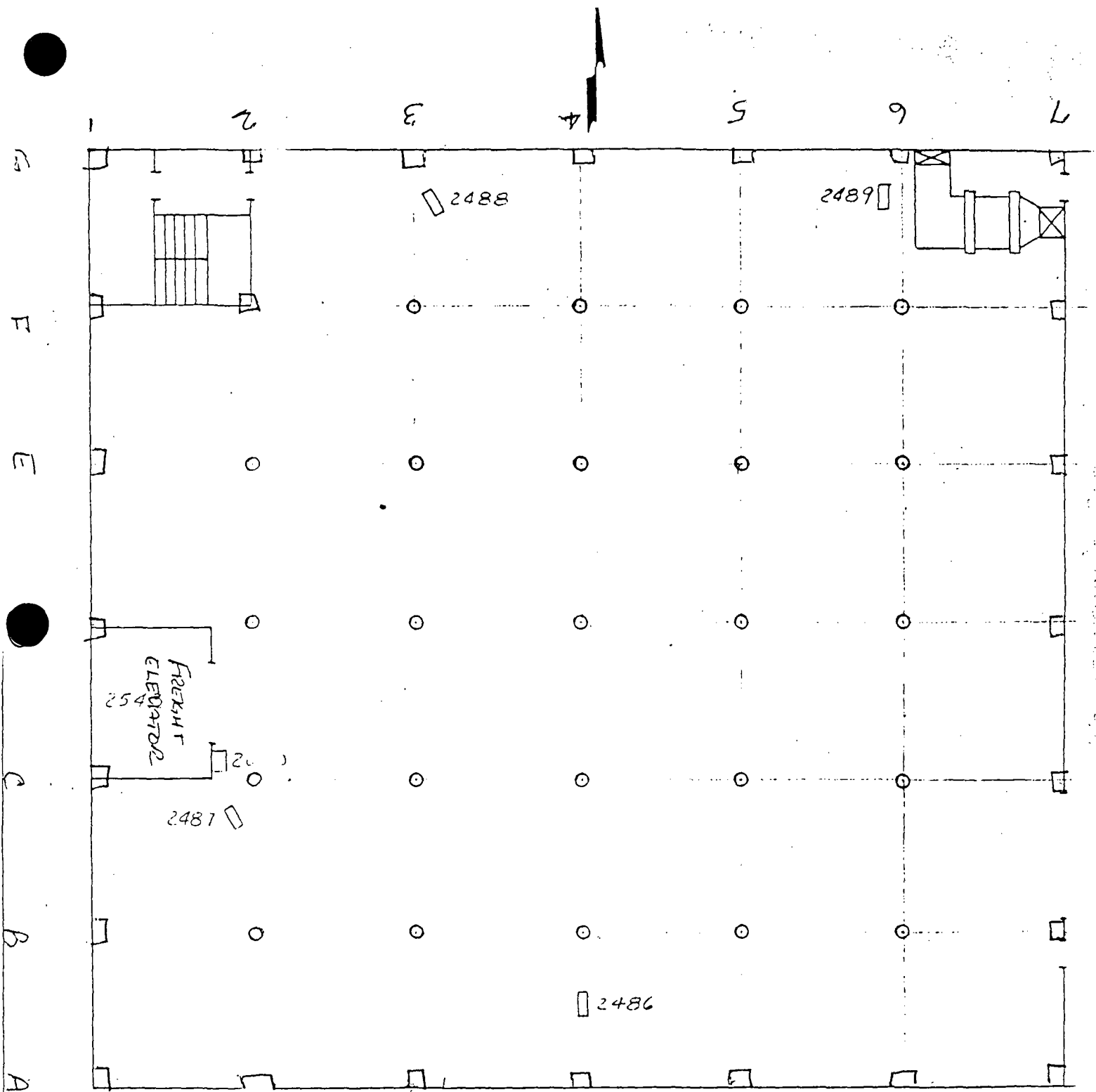
A. Dieffenbach *sem*  
A.E. Dieffenbach

F. Malczuk *gn*  
F. Malczuk

/glm

842899611



5TH FLOOR PLAN

REV 1/11/89  
ENGINEERING DEPT.

WAREHOUSE BLDG.  
BLDG. No. 37

NOTICE TO RESPONSIBLE PARTY UNDER THE COMPREHENSIVE ENVIRONMENTAL RESPONSE,  
COMPENSATION AND LIABILITY ACT OF 1980

AS AMENDED BY SARA, 1986

DATE OF ISSUANCE: <u>1-17-92</u>	NAME & TITLE OF NOTICE RECIPIENT: <u>KENT TAYLOR</u> <u>PLANT MGR.</u>
ADDRESSEE: <u>REICHHOLD CHEMICALS INC.</u> <u>400 DOREMUS AVE</u> <u>NEWARK, NJ</u>	NAME OF RESPONSIBLE PARTY: <u>REICHHOLD CHEMICALS INC.</u>

The United States Environmental Protection Agency (EPA) hereby notifies you that you may be liable under the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. §9601 et seq., (CERCLA) for the release and/or threatened release of pollutants, contaminants and/or hazardous substances as defined by CERCLA.

The release and/or threatened release noticed herein, has occurred on  
(Date) 1-10-92, is located at 400 DOREMUS AVE  
NEWARK, NEW JERSEY

and consists of (Description of Incident) FIRE / EXPLOSION  
INVOLVING CERCLA / SARA / CWA HAZARDOUS SUBSTANCE:

The EPA hereby requests that by 1-22-92 you report to the EPA, Region II, at the address and telephone number indicated below, those removal activities, in conformance with 42 U.S.C. §9601(23), which you have performed and/or those removal activities which you plan to perform immediately, to prevent, correct, clean up, minimize or mitigate the above-described release and/or threatened release.

You are hereby notified that upon your failure to perform immediate and proper removal activities with regard to the above-described release and/or threatened release, EPA, pursuant to 42 U.S.C. §9604, may perform such removal activities, and EPA will hold you liable for all costs of removal and for damages for injury to, destruction of, or loss of natural resources, including the reasonable costs of assessing such injury, destruction, or loss, if you are determined to be a responsible party.

If you deny responsibility for the above-described release and/or threatened release, you are requested to immediately advise EPA at the address and telephone number indicated below of the specific basis for your denial of responsibility.

FOR THE REGIONAL ADMINISTRATOR EPA REGION II  NAME: <u>CHARLES E. FITZSIMMONS</u>  TITLE: <u>OSC</u>	EPA ADDRESS AND TELEPHONE NUMBER:  U.S. EPA, Region II Emergency Response Branch Woodbridge Avenue Edison, New Jersey 08837 <u>908 (201) 548-8730 (24-hour Hotline)</u> <u>908 (201) 321-6657 (Business Hours)</u>
---------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**Reichhold Chemicals, Inc.**  
Corporate Headquarters  
P.O. Box 13582  
Research Triangle Park, NC 27709-3582

**REICHHOLD**

January 21, 1992

Mr. Charles E. Fitzsimmons  
U.S. Environmental Protection Agency, Region II  
Emergency Response Branch  
Woodbridge Avenue  
Edison, NJ 08837

Re: Removal Activities  
Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey

File: 5395.001 #2

Dear Mr. Fitzsimmons:

This letter serves to address the Notice of Release and/or Threatened Release of Pollutants, Contaminants, and/or Hazardous Substances as defined by the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) issued on January 17, 1992 by the United States Environmental Protection Agency (EPA). As requested by the EPA, this letter identifies removal activities planned by Reichhold Chemicals, Inc. (Reichhold) at their facility on 400 Doremus Avenue in Newark, New Jersey in response to an explosion and fire which occurred on Friday, January 10, 1992 at approximately 11:30 p.m.

The incident occurred at the referenced facility in a five-story brick and concrete structure divided by a partitioning wall. These two sections are identified as Buildings 31 and 32 and, at the time of the accident, were utilized for the production and limited storage of resins. The explosion and fire was centered around one vessel, T-125, located on the fifth floor of Building 31. The explosion damaged the fifth floor of Building 31 with the ensuing fire causing damage to the material storage area on the fourth and fifth floors of Building 32.

Raw materials were stored on the fifth floor of Building 32, including drums of peroxides. The interior walls surrounding these peroxides also suffered damage. The structural integrity of this area along with the condition of the peroxides is currently under investigation.

Reichhold, in conformance with 42 United States Codes (U.S.C.) 9601(23), plans the following Phase I removal activities to monitor, assess, and evaluate the release or threat of release of hazardous substances, the disposal of removed material and the taking of such actions as may be necessary to prevent, minimize, or mitigate damage to the public health or welfare or to the environment, which may otherwise result from the release. Reichhold has retained the services of O'Brien & Gere Engineers, Inc. (O'Brien & Gere), OHM Remediation Services Corporation (OHM), and Advanced Environmental Technology Corporation (AETC) to assist in the Phase I investigation and remediation activities.

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Mr. Charles E. Fitzsimmons  
January 21, 1992  
Page 2

A team of engineers and scientists from O'Brien & Gere met with representatives from Reichhold at the facility on Sunday, January 12, 1992 to conduct a preliminary site inspection following the fire. Members of the investigation team included Environmental Managers, Process, Structural, and Construction Engineers along with a Hydrogeologist and a Toxicologist. The preliminary inspection was performed to determine the initial extent of the explosion and fire and to identify and characterize any immediate impact or threat of release at the site.

Upon completion of the preliminary inspection, O'Brien & Gere completed a Phase I Health and Safety Plan (HASP) and a structural review of the integrity of the fifth floors of Buildings 31 and 32. OHM and AETC have been contracted to begin work to prevent any further impact to the local environment from the incident and to mitigate the existing threat of release and begin the cleanup and removal of debris from the site.

OHM and AETC, the remediation contractors, mobilized to the site on Friday, January 17, 1992. Once the contractors had completed set-up of their field offices, safety controls and preliminary safety meeting, the general cleanup was begun. OHM employees began cleanup of objects protruding from the structure such as window frames, glass panes, loose asbestos containing materials (ACMs), and miscellaneous hazards. The removal of the reactive peroxides which are possibly shock sensitive, including visibly bulged drums and Tank 119 located on the fifth floors, have been identified as a high priority. Removal of the shock-sensitive materials is scheduled to begin on January 22, 1992. This task will be performed by AETC whose reactive specialist personnel have the expertise and equipment to stabilize the material on-site and then arrange for off-site disposal.

Once the reactive materials have been safely removed and stabilized, the entire fifth floor area will be prepared for the installation of a vertical frame shoring system that will be required to support the damaged roof.

Following the removal of miscellaneous debris, OHM began conducting a general product inventory of the materials on the first, second and third floors in Buildings 31 and 32. The survey began on the ground floors and proceeded to the third floors which were surveyed last. A detailed inventory of the fourth and fifth floors consisting of the location of each drum, bag or portable tank whether loaded, full or empty, any labeling or identification, their locations relative to the floor plan and their conditions will be completed during Phase II activities.

After completion of the inventory, removal of the salvageable materials from the first three floors will begin. O'Brien & Gere and Reichhold personnel will determine suitable storage for this material or determine if it should be disposed of as a waste in compliance to local, state and federal guidelines. General cleanup of the first three floors will coincide with the removal of the raw and finished product.

Remedial activities at the Reichhold, Newark, New Jersey facility will be completed in as timely a manner as safety and prevailing weather conditions permit. O'Brien & Gere, working in close association with Reichhold at both the facility and corporate levels, will oversee the

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Mr. Charles E. Fitzsimmons  
January 21, 1992  
Page 3

Phase I removal of any released hazardous substances which resulted from the incident on January 12, 1992, by OHM Remediation Services and their specialty subcontractor, Advanced Environmental Technology. Upon completion of these remedial activities, O'Brien & Gere will begin supplemental, Phase II activities which will include a comprehensive investigation and characterization which will determine the presence of any prevailing physical impact to Buildings 31 and 32 and the immediate area. This will include the cleanup and removal and, if necessary, the disposal of materials from the fourth and fifth floors.

Should the EPA need any further information detailing the removal activities for this incident, please feel free to contact me at (919) 990-7570.

Very truly yours,

REICHHOLD CHEMICALS, INC.



David Bright  
Manager of Environmental Compliance

fax 756-5797

### CHAIN OF CUSTODY

**842899617**

[illegible]

C-906

ACCREDITED LABORATORIES, INC  
PCB ORGANIC ANALYSIS DATA

CASE NUMBER 9061  
SAMPLE NUMBER 9200185 P/P A9  
DATA FILE >G0569  
CLIENT NAME AIMS  
FIELD ID #3

MATRIX Aqueduct  
DILUTION FACTOR 1.00  
DATE EXTRACTED 01/13/92  
DATE ANALYZED 01/14/92  
ANALYZED BY CARLOS

CAS#	COMPOUND	UG/L	MDL
12674112	Aroclor-1016	U	1.0
11104282	Aroclor-1221	U	1.0
11141165	Aroclor-1232	U	2.0
53469219	Aroclor-1242	U	1.0
12672296	Aroclor-1248	U	1.0
11097691	Aroclor-1254	U	1.0
11096825	Aroclor-1260	U	1.0

- (J) Indicates detected below MDL  
(U) Indicates compound analyzed for but not detected  
(B) Indicates analyte found in both the blank and sample  
(D) Indicates a secondary dilution

842899618

Accredited Laboratories, Inc.  
Total Cyanide

Client: AIMS  
Case #: 9061  
Analyst: APZ

Matrix: Aqueous  
Date Prepared: 01/13/92  
Date Analyzed: 01/14/92

Field #	Sample #	Result mg/L	MDL mg/L
#1	9200183	ND	0.03
#2	9200184	ND	0.03
#3	9200185	ND	0.03

Quality Control Number:	911219AC
Method Blank:	< 0.01
Percent Spike Recovery:	94.8
Control Limit:	0.01

842899619



Accredited Laboratories, Inc.  
pH

Client: AIMS  
Case #: 9061  
Analyst: LS

Matrix: Aqueous  
Date Sampled: 1/11/92  
Date Received: 1/13/92  
Date Analyzed: 1/13/92

Field #	Sample #	Result SU	MDL SU
#1	9200183	4.78	0.05
#2	9200184	6.97	0.05
#3	9200185	8.85	0.05

ACCREDITED LABORATORIES, INC  
PESTICIDE ANALYSIS DATA

NUMBER 9061  
SAMPLE NUMBER 9200184 P/P AQ  
DATA FILE >A3145  
CLIENT NAME AIMS  
FIELD ID #2

MATRIX Aqueous  
DILUTION FACTOR 1.00  
DATE EXTRACTED 01/13/92  
DATE ANALYZED 01/14/92  
ANALYZED BY CARLOS

COMPOUND	UG/L	MDL
A-BHC	U	.05
B-BHC	U	.05
Lindane	U	.05
D-BHC	U	.05
Heptachlor	U	.05
Aldrin	U	.05
Heptachlor Epoxide	U	.05
Endosulfan i	U	.05
Dieldrin	U	.10
DDE	U	.10
Endrin	U	.10
Endosulfan II	U	.10
DDD	U	.10
Endrin Aldehyde	U	.10
Endosulfan Sulfate	U	.10
4,4'-DDT	U	.10
Endrin Ketone	U	.10
Methoxychlor	U	.50
A-Chlordane	U	.50
G-Chlordane	U	.50
Toxaphene	U	1.00

(J) Indicates detected below MDL

(U) Indicates compound analyzed for but not detected

842899621

ACCREDITED LABORATORIES, INC  
PCB ORGANIC ANALYSIS DATA

CASE NUMBER 9061  
SAMPLE NUMBER 9200183 P/P AQ  
DATA FILE >G0567  
CLIENT NAME AIMS  
FIELD ID #1

MATRIX Aqueous  
DILUTION FACTOR 1.00  
DATE EXTRACTED 01/13/92  
DATE ANALYZED 01/14/92  
ANALYZED BY CARLOS

CAS#	COMPOUND	UG/L	MDL
12674112	Aroclor-1016	U	1.0
11104282	Aroclor-1221	U	1.0
11141165	Aroclor-1232	U	2.0
53469219	Aroclor-1242	U	1.0
12672296	Aroclor-1248	U	1.0
11097691	Aroclor-1254	U	1.0
11096825	Aroclor-1260	U	1.0

- (J) Indicates detected below MDL  
(U) Indicates compound analyzed for but not detected  
(B) Indicates analyte found in both the blank and sample  
(D) Indicates a secondary dilution

842899622

ACCREDITED LABORATORIES, INC  
PESTICIDE ANALYSIS DATA

C NUMBER  
SAMPLE NUMBER  
DATA FILE  
CLIENT NAME  
FIELD ID

9061  
9200183 P/P AQ  
A3144  
AIMS  
#1

MATRIX  
DILUTION FACTOR  
DATE EXTRACTED  
DATE ANALYZED  
ANALYZED BY

Aqueous  
1.00  
01/13/92  
01/14/92  
CARLOS

COMPOUND	UG/L	MDL
A-BHC	U	.05
B-BHC	U	.05
Lindane	U	.05
D-BHC	U	.05
Heptachlor	U	.05
Aldrin	U	.05
Heptachlor Epoxide	U	.05
Endosulfan I	U	.05
Dieldrin	U	.10
DDE	U	.10
Endrin	U	.10
Endosulfan II	U	.10
DDD	U	.10
Endrin Aldehyde	.14	.10
Endosulfan Sulfate	U	.10
4,4'-DDT	U	.10
Endrin Ketone	U	.10
Methoxychlor	U	.50
A-Chlordane	U	.50
B-Chlordane	U	.50
Toxaphene	U	1.00

(J) Indicates detected below MDL

(U) Indicates compound analyzed for but not detected

842899623

ACCREDITED LABORATORIES, INC  
BWA ORGANIC ANALYSIS DATA

CASE NUMBER 9061  
 SAMPLE NUMBER 9200185  
 FILE >F2064 & >B7929  
 CLIENT NAME AIMS  
 FIELD ID #3

MATRIX AQUICOL  
 DILUTION FACTOR 1.00 & 500.0  
 DATE EXTRACTED 01/13/92  
 DATE ANALYZED 01/14/92 & 01/19/92  
 ANALYZED BY MARIE

Cas #	Compound	UG/L	MDL
108952	Phenol	5703	10
95578	2-Chlorophenol	U	10
95487	2-Methylphenol	U	10
108394	3-Methylphenol	U	10
106445	4-Methylphenol	U	10
88755	2-Nitrophenol	U	10
105679	2,4-Dimethylphenol	U	10
120832	2,4-Dichlorophenol	U	10
111444	bis(-2-Chloroethyl)Ether	U	10
541731	1,3-Dichlorobenzene	U	10
106467	1,4-Dichlorobenzene	U	10
100516	Benzyl Alcohol	U	10
95501	1,2-Dichlorobenzene	U	10
108601	bis(2-Chloroisopropyl)ether	U	10
621647	N-Nitroso-Di-n-propylamine	U	10
67721	Hexachloroethane	U	10
98953	Nitrobenzene	U	10
78591	Isophorone	U	10
65850	Benzoic Acid	U	50
111911	bis(-2-Chloroethoxy)Methane	U	10
120821	1,2,4-Trichlorobenzene	U	10
78	Naphthalene	200	10
87683	4-Chloroaniline	U	10
91576	Hexachlorobutadiene	U	10
77474	2-Methylnaphthalene	255	10
91587	Hexachlorocyclopentadiene	U	10
88744	2-Chloronaphthalene	U	10
131113	2-Nitroaniline	U	50
208968	Dimethyl Phthalate	U	10
99092	Acenaphthylene	U	10
83329	3-Nitroaniline	U	50
132649	Acenaphthene	U	10
606202	Dibenzofuran	U	10
59507	2,6-Dinitrotoluene	U	10
88062	4-Chloro-3-methylphenol	U	10
95954	2,4,6-Trichlorophenol	U	10
	2,4,5-Trichlorophenol	U	50

Cas #	Compound	UG/L	MDL
51285	2,4-Dinitrophenol	U	50
100027	4-Nitrophenol	U	50
534521	4,6-Dinitro-2-methylphenol	U	50
87865	Pentachlorophenol	U	50
121142	2,4-Dinitrotoluene	U	10
84662	Diethylphthalate	U	10
7005723	4-Chlorophenyl-phenylether	U	10
85737	Fluorene	U	10
100016	4-Nitroaniline	U	50
58902	2,3,4,6-Tetrachlorophenol	U	10
86306	N-Nitrosodiphenylamine	U	10
101553	4-Bromophenyl-phenylether	U	10
118741	Hexachlorobenzene	U	10
85018	Phenanthrene	32	10
120127	Anthracene	U	10
84742	Di-n-Butylphthalate	U	10
206440	Fluoranthene	U	10
129000	Pyrene	U	10
85687	Butylbenzylphthalate	U	10
91941	3,3'-Dichlorobenzidine	U	20
56553	Benzo(a)Anthracene	U	10
117817	Bis(2-Ethylhexyl)Phthalate	154	10
218019	Chrysene	U	10
117840	Di-n-octyl phthalate	U	10
205992	Benzo(b)fluoranthene	U	10
207089	Benzo(k)Fluoranthene	U	10
50328	Benzo(a)Pyrene	U	10
193395	Indeno(1,2,3-cd)Pyrene	U	10
55703	Dibenzo(a,h)Anthracene	U	10
191242	Benzo(g,h,i)Perylene	U	10
62759	N-Nitrosodimethylamine	U	10
92875	Benzidine	U	10
122667	1,2-Diphenylhydrazine	U	10
110861	Pyridine	U	10
79469	2-Nitropropane	U	10
62533	Aniline	U	10

<u>SURROGATE COMPOUNDS</u>	<u>RECOVERY</u>	<u>LIMITS</u>	<u>STATUS</u>
2-Fluorophenol	<u>7.8 %</u>	21 - 100	OUT
Phenol-d5	<u>16.3 %</u>	10 - 94	OK
Nitrobenzene-d5	<u>33.4 %</u>	35 - 114	OUT
2-Fluorobiphenyl	<u>22.9 %</u>	43 - 116	OUT
2,4,6-Tribromophenol	<u>20.3 %</u>	10 - 123	OK
Terphenyl-d14	<u>68.6 %</u>	33 - 141	OK

(J) Indicates detected below MDL

(B) Indicates analyte found in both the blank and sample

(U) Indicates compound analyzed for but not detected

(D) Indicates a secondary dilution

\*\* 3-Methylphenol and 4-methylphenol can not be separated by the method applied.

842899624

ACCREDITED LABORATORIES, INC  
BNA ORGANIC ANALYSIS DATA

NUMBER 9061  
SAMPLE NUMBER 9200184  
DATA FILE >F2063 & F2066  
CLIENT NAME AIMS  
FIELD ID #2

MATRIX Aqueous  
DILUTION FACTOR 1.00 & 10.0  
DATE EXTRACTED 01/13/92  
DATE ANALYZED 01/14/92  
ANALYZED BY MARIE

Case #	Compound	UG/L	MDL
108952	Phenol	U	20
95578	2-Chlorophenol	U	20
95487	2-Methylphenol	U	20
108394	3-Methylphenol	U	20
106443	4-Methylphenol	U	20
83755	2-Nitrophenol	U	20
105679	2,4-Dimethylphenol	U	20
120832	2,4-Dichlorophenol	U	20
111444	bis(-2-Chloroethyl)Ether	U	10
541731	1,3-Dichlorobenzene	U	10
106467	1,4-Dichlorobenzene	U	10
100516	Benzyl Alcohol	U	10
95501	1,2-Dichlorobenzene	U	10
108601	bis(2-Chloroisopropyl)ether	U	10
621647	N-Nitroso-Di-n-propylamine	U	10
67721	Hexachloroethane	U	10
98953	Nitrobenzene	U	10
78591	Isophorone	U	10
65050	Benzoic Acid	U	100
	bis(-2-Chloroethoxy)Methane	U	10
120821	1,2,4-Trichlorobenzene	U	10
91203	Naphthalene	53	10
106478	4-Chloroaniline	U	10
87683	Hexachlorobutadiene	U	10
91576	2-Methylnaphthalene	U	10
77474	Hexachlorocyclopentadiene	U	10
91587	2-Chloronaphthalene	U	10
88744	2-Nitroaniline	U	50
131113	Dimethyl Phthalate	U	10
208968	Acenaphthylene	U	10
99092	3-Nitroaniline	U	50
83329	Acenaphthene	U	10
132649	Dibenzofuran	U	10
606202	2,6-Dinitrotoluene	U	10
59507	4-Chloro-3-methylphenol	U	20
88062	2,4,6-Trichlorophenol	U	20
95954	2,4,5-Trichlorophenol	U	100

Case #	Compound	UG/L	MDL
51285	2,4-Dinitrophenol	U	100
100027	4-Nitrophenol	U	100
534521	4,6-Dinitro-2-methylphenol	U	100
87865	Pentachlorophenol	U	100
121142	2,4-Dinitrotoluene	U	10
84662	Diethylphthalate	U	10
7005723	4-Chlorophenyl-phenylether	U	10
86737	Fluorene	U	10
100016	4-Nitroaniline	U	50
58902	2,3,4,6-Tetrachlorophenol	U	10
86306	N-Nitrosodiphenylamine	U	10
101553	4-Bromophenyl-phenylether	U	10
118741	Hexachlorobenzene	U	10
85018	Phenanthrene	U	10
120127	Anthracene	U	10
84742	Di-n-Butylphthalate	U	10
206440	Fluoranthene	50	10
129000	Pyrene	U	10
85687	Butylbenzylphthalate	U	10
91941	3,3'-Dichlorobenzidine	U	20
56553	Benzo(a)Anthracene	3(J)	10
117817	Bis(2-Ethylhexyl)Phthalate	37	10
218019	Chrysene	U	10
117840	Di-n-octyl phthalate	U	10
205992	Benzo(b)fluoranthene	8(J)	10
207089	Benzo(k)fluoranthene	U	10
50328	Benzo(a)Pyrene	U	10
193395	Indeno(1,2,3-cd)Pyrene	U	10
53703	Dibenzo(a,h)Anthracene	U	10
191242	Benzo(g,h,i)Perylene	U	10
62759	N-Nitrosodimethylamine	U	10
92875	Benzidine	U	10
122667	1,2-Diphenylhydrazine	U	10
110861	Pyridine	U	10
79469	2-Nitropropane	U	10
62533	Aniline	U	10

SURROGATE COMPOUNDS

2-Fluorophenol  
Phenol-d5  
Nitrobenzene-d5  
2-Fluorobiphenyl  
2,4,6-Tribromophenol  
Terphenyl-d14

RECOVERY

28.0 %  
77.8 %  
25.0 %  
49.6 %  
47.2 %  
30.4 %

LIMITS

21 - 100  
10 - 94  
35 - 114  
43 - 116  
10 - 123  
33 - 141

STATUS

OK  
OK  
OUT  
OK  
OK  
OUT

(J) Indicates detected below MDL

(B) Indicates analyte found in both the blank and sample

(U) Indicates compound analyzed for but not detected

(D) Indicates a secondary dilution

\*\* 3-Methylphenol and 4-methylphenol can not be separated by the method applied.

842899625

ACCREDITED LABORATORIES, INC  
BWA ORGANIC ANALYSIS DATA

NUMBER 9061  
FILE NUMBER 9200183  
DATA FILE >F2062  
CLIENT NAME AIMS  
FIELD ID #1

MATRIX Aqueous  
DILUTION FACTOR 7.50  
DATE EXTRACTED 01/13/92  
DATE ANALYZED 01/14/92  
ANALYZED BY MARIE

Cas #	Compound	UQ/L	MDL
108952	Phenol	U	75
95578	2-Chlorophenol	U	75
95487	2-Methylphenol	U	75
108394	3-Methylphenol	U	75
106445	4-Methylphenol	U	75
88755	2-Nitrophenol	U	75
105679	2,4-Dimethylphenol	U	75
120832	2,4-Dichlorophenol	U	75
111444	bis(-2-Chloroethyl)Ether	U	75
541731	1,3-Dichlorobenzene	U	75
106467	1,4-Dichlorobenzene	U	75
100516	Benzyl Alcohol	U	75
95501	1,2-Dichlorobenzene	U	75
108601	bis(2-Chloroisopropyl)ether	U	75
621647	N-Nitroso-Di-n-propylamine	U	75
67721	Hexachloroethane	U	75
98953	Nitrobenzene	U	75
78591	Isophorone	U	75
65850	Benzoic Acid	U	375
1	bis(-2-Chloroethoxy)Methane	U	75
1	1,2,4-Trichlorobenzene	U	75
91203	Naphthalene	U	75
106478	4-Chloroaniline	U	75
87683	Hexachlorobutadiene	U	75
91576	2-Methylnaphthalene	U	75
77474	Hexachlorocyclopentadiene	U	75
91587	2-Chloronaphthalene	U	75
88744	2-Nitroaniline	U	375
131113	Dimethyl Phthalate	U	75
208968	Acenaphthylene	U	75
99092	3-Nitroaniline	U	375
83329	Acenaphthene	U	75
132649	Dibenzofuran	U	75
606202	2,6-Dinitrotoluene	U	75
59507	4-Chloro-3-methylphenol	U	75
88062	2,4,6-Trichlorophenol	U	75
95954	2,4,5-Trichlorophenol	U	375

Cas #	Compound	UQ/L	MDL
51285	2,4-Dinitrophenol	U	375
100027	4-Nitrophenol	U	375
534521	4,6-Dinitro-2-methylphenol	U	375
87065	Pentachlorophenol	U	375
121142	2,4-Dinitrotoluene	U	75
84662	Diethylphthalate	U	75
7005723	4-Chlorophenyl-phenylether	U	75
66737	Fluorene	U	75
100016	4-Nitroaniline	U	375
58902	2,3,4,6-Tetrachlorophenol	U	75
86306	N-Nitrosodiphenylamine	U	75
101553	4-Bromophenyl-phenylether	U	75
118741	Hexachlorobenzene	U	75
85018	Phenanthrene	U	75
120127	Anthracene	U	75
84742	Di-n-Butylphthalate	U	75
206440	Fluoranthene	U	75
129000	Pyrene	U	75
85687	Butylbenzylphthalate	U	75
91941	3,3'-Dichlorobenzidine	U	150
56553	Benzo(a)Anthracene	U	75
117817	Bis(2-Ethylhexyl)Phthalate	77	75
218019	Chrysene	U	75
117840	Di-n-octyl phthalate	U	75
205992	Benzo(b)fluoranthene	U	75
207039	Benzo(k)fluoranthene	U	75
50328	Benzo(a)Pyrene	U	75
193395	Indeno(1,2,3-cd)Pyrene	U	75
53703	Dibenzo(a,h)Anthracene	U	75
191242	Benzo(g,h,i)Perylene	U	75
62759	N-Nitrosodimethylamine	U	75
92875	Benzidine	U	75
122667	1,2-Diphenylhydrazine	U	75
110861	Pyridine	U	75
79469	2-Nitropropane	U	75
62533	Aniline	U	75

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
2-Fluorophenol	24.2 %	21 - 100	OK
Phenol-d5	90.4 %	10 - 94	OK
Nitrobenzene-d5	131.7 %	35 - 114	OUT
2-Fluorobiphenyl	94.8 %	43 - 116	OK
2,4,6-Tribromophenol	37.6 %	10 - 123	OK
Terphenyl-d14	71.8 %	33 - 141	OK

(J) Indicates detected below MDL

(B) Indicates analyte found in both the blank and sample

(U) Indicates compound analyzed for but not detected

(D) Indicates a secondary dilution

3-Methylphenol and 4-methylphenol can not be separated by the method applied.

842899626

ACCREDITED LABORATORIES, INC  
PCB ORGANIC ANALYSIS DATA

CASE NUMBER 9061  
SAMPLE NUMBER 9200184 P/P AQ  
DATA FILE >Q0568  
CLIENT NAME AIMS  
FIELD ID #2

MATRIX Aqueous  
DILUTION FACTOR 1.00  
DATE EXTRACTED 01/13/92  
DATE ANALYZED 01/14/92  
ANALYZED BY CARLOS

CAS#	COMPOUND	UQ/L	MDL
12674112	Aroclor-1016	U	1.0
11104282	Aroclor-1221	U	1.0
11141165	Aroclor-1232	U	2.0
53469219	Aroclor-1242	U	1.0
12672296	Aroclor-1248	U	1.0
11097691	Aroclor-1254	U	1.0
11096825	Aroclor-1260	U	1.0

- (J) Indicates detected below MDL  
(U) Indicates compound analyzed for but not detected  
(B) Indicates analyte found in both the blank and sample  
(D) Indicates a secondary dilution



**Reichhold Chemicals, Inc.**

Coating Polymers & Resins Division  
400 Doremus Avenue  
Newark, NJ 07105

**REICHHOLD**

HAND DELIVERED

January 29, 1992

Chialing Ting, Civil Engineer  
US Environmental Protection Agency  
Region II Technical Assistance Team  
Roy F. Weston, Inc.  
1090 King Georges Post Road  
Suite 201  
Edison, NJ 08837

Dear Mr. Ting:

Per your request, a narrative description of site activities to date follows.

A fire and explosion occurred at Reichhold Chemicals' Newark Doremus facility on January 10th of this month. Immediately following the incident, facility personnel, with assistance from American Industrial Marine Services, secured the site by removing standing fire run-off water from both inside and outside of the building, as well as barricading the surroundings, and restricting access to the facility.

Subsequent activities include:

- Supporting investigative efforts of various agencies including: BATF, NJDEP, USEPA, OSHA, Essex County Prosecutors Office, NJDOH, Newark Police Department, Newark Fire Department, USCG, etc.
- A structural assessment by O'Brien and Gere.
- Barricading of unsafe areas including open shafts, structurally unsound areas, etc.
- Removal of hanging debris (window frames). [Ongoing]
- Creation of an access point to the 32-5 area by removal of a portion of the curtain wall.
- Removal of approximately 400 drums of flammable and combustible resin products to create a staging area within the building for wastes, etc., salvage saleable products, and minimize fire loading.
- Removal of the organic peroxides from 32-5.

page 2  
Chialing Ting  
January 29, 1992

- Overpacking and removal of 6 bulged drums of 2-hydroxyethylacrylate from 31-5 and 32-5.
- Staging of a 20,000 gallon portable tank to handle contaminated/potentially contaminated waters removed from the building.
- Removal of standing water from 32-5 and 31-5. [Ongoing]
- Removal of standing water from the freight elevator shaft.
- Establishment of dikes in the first floor area to prevent runoff through various doorways.
- Reestablishment of the floor drain system, and draining of the 6,000 gallon catch tank on the first floor. [Ongoing]

Activities for today, January 29 will include:

- Emptying and inhibiting a reactive monomer mixture (2-hydroxyethyl acrylate, styrene, glacial acrylic acid, methyl methacrylate, est. volume 3,000 gallons) from T119.

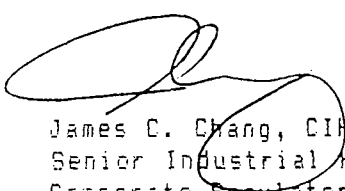
Future activities are anticipated to include:

- Receipt of shoring materials for 32-5.
- Installation of shoring with concurrent material removal from 32-5.

This concludes the description of activities on site from the period January 12 - 28.

Please advise if you require additional information or have any questions.

Sincerely,



James C. Chang, CIH  
Senior Industrial Hygienist  
Corporate Regulatory Affairs

842899629

1-17-92

## INVENTORY B31-2 NEWARK DOREMUS

## NOTES:

1. All quantities are worst case and subject to revision
2. All quantities unless otherwise noted are in pounds.

BISPHENOL-A	13,350
HEXAMETHYLENETETRAMINE	9,400
STYRENE MONOMER (IN TANK T-119)	10,000
PARAFORMALDEHYDE	70,486
PTBBA	2,630
BENZOIC ACID	15,000
METHYL METHACRYLATE	50,904
VINYL TOLUENE	?
TRIETHYLAMINE	738
PENTAERYTHRITOL	38,000
TRIMET	7,760
GLACIAL METHACRYLIC ACID	4,140
DIETHANOLAMINE	8,435
ETHYLNEXYL ACRYLATE	1,600
DMCD	40,050
GLACIAL ACRYLIC ACID	9,744
BUTYL ACRYLATE (55 GAL. DRUMS)	22,012
PALARGONIC ACID	6,045
TRIMELLITIC ANHYDRIDE (2,000 LB. SACKS)	27,080
SANTICIZER 9	201,946
CHLORENDIC ANHYDRIDE	26,000
BENZOGUANAMINE	80,325
T-BUTYL PERBENZOATE	419
ISOPHTHALLIC ACID	96,538
MALEIC ANHYDRIDE	17,435
PHTHALLIC ANHYDRIDE (2,000 LB. SACKS)	19,050
MELAMINE (2,000 LB. SACKS)	17,650
HYDROXYPROPYL METHACRYLATE	458
HYDROXYETHYL ACRYLATE	4,080
DI-T-BUTYL PEROXIDE	920
N-PROPYL ACETATE	15,000
UREA	75,150
VAZO 64	417
PEG 3350	1,000
NEVILLE C115	14,500
ISOCTYLTHIOGLYCOLATE	1,254
BAKELITE CKM-2400	1,250
UCAR CK-2500	1,850
BETAPRENE BC 115	16,400
TOLUENE	85,851
XYLENE	271,699
BUTYL CELLOSOLVE	74,418
ETHYL BENZENE	54,996

DIETHYLSULFATE (H2S SOURCE)  
DICUMYLPEROXIDE

1,394  
100

\* DOES NOT INCLUDE PARTIALLY REACTED MATERIALS IN REACTORS  
\* TOTAL MASS LOADING ESTIMATE 400,000 - 875,000 LBS.

1-17-92

## INVENTORY BUILDING 31-2, 5TH FLOOR, NEWARK - DOREMUS

00006-00	BISPHENOL A	9,550
00054-00	HEXAMETHYLENETETRAMINE	9,400
00088-00	STYRENE MONOMER	10,000 - ?
00101-00	PARAFORMALDEHYDE	70,486
00113-00	PTBBA	450 - ?
00133-00	BENZOIC ACID	15,000 ✓
00168-00	TRIETHYAMINE	738 ✓
00171-00	PENTAERYTHRITOL	26,000
00195-00	TRIMET	7,760
00259-00	GLACIAL METHACRYLIC ACID	4,140
00272-00	DIETHALOMINE	8,435 ✓
00292-00	ETHYLHEXYL ACRYLATE	1,600
00365-00	DMCD	40,050
00390-00	GLACIAL ACRYLIC ACID	9,744 - ?
00398-00	BUTYL ACRYLATE	22,012
00418-00	PELARGONIC ACID	6,045
00470-00	TRIMELLITIC ANHYDRIDE	27,080
00489-00	SANTICIZER 9 (OPTSA)	116,061
00743-00	CHLORENDIC ANHYDRIDE	26,000
00801-00	BENZOGUANAMINE	533
00931-00	T-BUTYL PERBENZOATE	419
01513-00	ISOPHTHALIC ACID	82,798
02631-00	MALEIC ANHYDRIDE	17,435
02641-00	PHTHALIC ANHYDRIDE	13,750
02675-00	MELAMINE	17,650
02689-00	HYDROXYPROPYL METHACRYLAT	458
02986-00	HYDROXYETHYL ACRYLATE	4,080
03094-00	DI-T-BUTYL PEROXIDE	920
03153-00	N-PROPYL ACETATE	15,000
03201-00	UREA	21,150
03285-00	VAZO 64	417
03380-00	PEG 3350	1,000
03401-00	NEVILLE C115	14,500
03410-00	ISDOCTYLTHIOGLYCOLATE	1,254
03430-00	BAKELITE CKM-2400	1,250
03455-00	UCAR CK-2500	1,850
03489-00	DICUMYL PEROXIDE	100
03583-00	BETAPRENE BC115	11,100

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616,215

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616,215

PRODUCT NUMBER	PRODUCT DESCRIPTION	OLD CODE	CURRENT BALANCE	ITEM COST	INVENTORY VALUE
13-00006-00-00	BISPHENOL A		13,350	6200	8,277.00
13-00014-00-00	ETHYLENE GLYCOL		42,842	1750	7,497.35
13-00030-00-00	PHOS ACID TECH 75%		4,860	3600	1,749.60
13-00052-00-00	DIETHYLENE GLYCOL		14,049	3800	5,338.62
13-00054-00-00	HEXAMETHYLENETETRAMINE		9,400	5024	4,722.56
13-00057-00-00	ADIPIC ACID		33,650	6000	20,190.00
13-00079-00-00	DIETHYLAMINE		800	1,2200	976.00
13-00088-00-00	STYRENE MONOMER T119	STYRENE MONOMER	77,071	3050	23,506.66
13-00097-00-00	FORMIC ACID 90 PCT		3,650	4500	1,642.50
13-00101-00-00	PARAFORMALD FLAKES		70,486	3125	22,026.88
13-00110-00-00	PROPLYENE GLYCOL		76,326	5000	38,163.00
13-00113-00-00	PTBBA	SK# 13-30219-TT	2,630	1,9601	5,155.06
13-00133-00-00	BENZOIC ACID		14,986	3912	5,862.52
13-00148-00-00	METHYL METHACRYLATE		50,903	5600	28,505.68
13-00156-00-00	VINYL TOLUENE		-7,610	7050	-5,365.05
13-00168-00-00	TRIETHYLAMINE	SK# 13-30069-TT	738	1,2900	952.02
13-00171-00-00	PENTAERYTHRITOL=PURE		37,700	5900	22,243.00
13-00193-00-00	DIMETHYL ETHANOLAMINE	SK# 13-30074-TT	996	1,3728	1,367.31
13-00195-00-00	TRIMET		7,760	8840	6,859.84
13-00196-00-00	TRIMETHYLOLPROPANE		20,064	8000	16,051.20
13-00207-00-00	NEOPENTYL GLYCOL		5,000	5900	2,950.00
13-00259-00-00	METHACRYLIC ACID GLA	SK# 13-30266-TT	4,140	1,1232	4,650.05
13-00272-00-00	DIETHANOL AMINE	SK# 13-30068-TT	8,435	7279	6,139.84
13-00292-00-00	ETHYLHEXYL ACRYLATE-	SK# 13-30517-TT	1,600	8117	1,298.72
13-00294-00-00	N-BUTYL METHACRYLATE		4,560	1,0500	4,788.00
13-00365-00-00	DMCD	SK# 13-30897-TT	40,050	1,1150	44,655.75
13-00390-00-00	ACRYLIC ACID, GLACIAL	SK# 13-30214-TT	9,744	8100	7,892.64
13-00398-00-00	BUTYL ACRYLATE=50	SK# 13-30516-TT	22,012	7300	16,068.76
13-00410-00-00	TETA		882	2,1620	1,906.88
13-00418-00-00	PELARGONIC ACID		6,045	1,1336	6,852.61
13-00422-00-00	BHT-TECH	SK# 13-47310-TT	70	1,7160	120.12
13-00470-00-00	TRIMELLITIC ANHYDRIDE	ANHYDRIDE	27,080	9638	26,099.70
13-00489-00-00	SANTICIZER 9		201,946	1,2900	260,510.34
13-00743-00-00	CHLORENDIC ANHYDRIDE		26,272	1,2195	32,038.70
13-00768-00-00	LITHIUM TEN CHEM 2%		2,384	2,2100	5,268.64
13-00801-00-00	BENZOGUANAMINE		80,325	1,3700	110,045.25
13-00931-00-00	T-BUTYL PERBENZOATE		412	3,0500	1,277.95
13-01513-00-00	ISOPHTHALIC ACID		96,548	4900	47,308.52
13-01539-00-00	DIBUTYL TIN OXIDE	SK# 13-30180-TT	1,949	8,3396	16,253.88
13-01781-00-00	HYPOPHOSPHOROUS ACID	SK# 13-31053-TT	644	3,7500	2,415.00
13-02063-00-00	EPON 828	SK# 13-30938-TT	1,387	1,4248	1,976.20
13-02091-00-00	T-BUTYL CATECHOL		450	2,1023	946.04
13-02480-00-00	NEOPENTYL GLYCOL 90%		92,210	5100	47,027.10
13-02602-00-00	GLYCERINE (NATURAL & SYNTHETIC)	SYNTHETIC)	73,910	3800	28,085.80
13-02620-00-00	METHANOL	METHANOL	68,723	0805	5,532.20
13-02631-00-00	MALEIC ANHYDRIDE	BRIQUETTES	17,435	5650	9,850.78
13-02640-00-00	PHTHALIC ANHYDRIDE		218,194	3639	79,400.80
13-02641-00-00	PHTHALIC ANHYDRIDE		12,050	2900	5,524.50
13-02647-00-00	D C 200 FLUID		120	3,5152	421.82
13-02663-00-00	ETHYLENE GLYCOL MONO	ETHYLENE GLYCOL MONO	1,330	6760	899.08
13-02671-00-00	PENTA ERYTHRITOL	TECH GRADE	100	6100	61.00
13-02675-00-00	MELANINE SS		17,650	5900	10,413.50

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PRODUCT NUMBER	PRODUCT DESCRIPTION	OLD CODE	CURRENT BALANCE	ITEM COST	INVENTORY VALUE
13-02689-00-00	✓ HYDROXY PROPYL METHA	SK# 13-30152-TT	458	1.5000	687.00
13-02846-00-00	BUTYL FORMALDEHYDE		97,571	.3052	29,778.67
13-02986-00-00	✓ HYDROXYETHYL ACRYLAT	SK# 13-30585-TT	4,080	1.7800	7,262.40
13-03014-00-00	PARAMETHYL STYRENE		61,893	.6690	41,406.42
13-03017-00-00	PROPYLENE GLYCOL	METHYL ETHER ACETATE	9,680	.5564	5,385.95
13-03073-00-00	METHYLETHYL KETOXIME	SK# 13-30722-TT	6,925	1.7300	11,980.25
13-03094-00-00	✓ DITERTIARY BUTYL	PEROXIDE	2,720	1.6500	4,488.00
13-03130-00-00	EE PROPIONATE	SK# 13-30149-TT	3,045	.6900	2,101.05
13-03137-00-00	✓ PROPRIETARY COBAL-CH		430	2.6728	1,149.30
13-03153-00-00	✓ N-PROPYL ACETATE		14,948	.6400	9,566.72
13-03201-00-00	✓ UREA		75,150	.1324	9,949.86
13-03205-00-00	FORMALDEHYDE 37%	SK# 13-30080-TT	660	2.000	132.00
13-03207-00-00	FORMALDEHYDE 44%		37,412	.0980	3,666.38
13-03245-00-00	HYDROGENATED BISPHEN	SK# 13-30379-TT	9,734	2.6600	25,892.44
13-03249-00-00	BETACHLOROANTHRAQUIN	SK# 13-30078-TT	875	8.8400	7,735.00
13-03285-00-00	✓ VAZO 64	SK# 13-30145-TT	1,267	4.9000	6,208.30
13-03337-00-00	DIBUTYL TIN DIACETATE	SK# 13-30329-TT	485	8.6590	4,199.62
13-03360-00-00	R.J.-100	SK# 13-49280-TT	100	1.7900	179.00
13-03369-00-00	✓ HYDROFOL ACIDS 1655	SK# 13-47510-TT	1,050	.6100	640.50
13-03380-00-00	PEG 3350	SK# 13-30118-TT	1,000	1.1960	1,196.00
13-03384-00-00	PALE BLOWN CASTOR	SK 22111	7,140	1.0400	7,425.60
13-03387-00-00	✓ HEXYLENE GLYCOL	SK# 13-30015-TT	854	.7800	666.12
13-03392-00-00	✓ TMP-MOLTEN	SK# 13-30030-TT	106,124	.8200	87,021.68
13-03395-00-00	OX-50	SK# 13-22121-TT	1,160	.4524	524.78
13-03401-00-00	✓ NEVILLE C 115	SK# 13-32401-TT	14,500	.6550	9,497.50
13-03405-00-00	✓ WYTOX 312		2,408	1.3339	3,212.03
13-03410-00-00	✓ ISOOCYL THIOGLCOLATE		1,254	5.0500	6,332.70
13-03426-00-00	✓ DIMER ACIDS		1,588	.7000	1,111.60
13-03430-00-00	✓ BAKELITE CKM-2400		1,250	1.6432	2,054.00
13-03455-00-00	✓ UCAR CK-2500	SK# 13-30924-TT	1,850	1.6016	2,962.96
13-03475-00-00	CALCIUM 8%		422	1.0800	455.76
13-03479-00-00	DIETHYL SULFATE	SK# 13-39128-TT	1,394	.8200	1,143.08
13-03489-00-00	DICUMYL PEROXIDE		525	5.0600	2,656.50
13-03524-00-00	✓ MAGIESOL 60		24	.4607	11.06
13-03544-00-00	✓ RECOVERED SOLVENT	SK# 13-72009-TT	187,809	.0001	18.78
13-03583-00-00	✓ BETAPRENE BC 115		16,400	.3850	6,314.00
13-03640-00-00	✓ AMMONIUM HYDROXIDE	25% MIN	7,604	.0875	665.35
13-03650-00-00	ACONEW+500		105,626	.2699	28,508.46
13-04003-00-00	CHINAWOOD OIL		23,715	.5360	12,711.24
13-04004-00-00	✓ NO. 1 CASTOR OIL		131,543	.5450	71,690.94
13-04016-00-00	DEHYDRATED CASTOR	OIL	-1,977	.6600	-1,304.82
13-04017-00-00	NON-BREAK SOYBEAN		311,325	.2371	73,815.16
13-04115-00-00	✓ PAMOLYN 200		74,855	.5900	44,164.45
13-07004-00-00	BUTANOL, BUTYL	ALCOHOL	234,461	.2800	65,649.08
13-07008-00-00	✓ TOLUENE		85,851	.1653	14,191.17
13-07010-00-00	✓ XYLENE COAL TAR TYPE		271,699	.1546	42,004.67
13-07014-00-00	METHYL ETHYL KETONE	SK# 13-72049-TT	8,999	.6350	5,714.37
13-07016-00-00	ISOPROPANOL (ALCOHOL)		10,744	.4600	4,942.24
13-07017-00-00	ETHYL ALCOHOL		84,683	.2900	24,558.07
13-07034-00-00	150 FLASH AROMATIC	SOLVENT	144,147	.2204	31,770.00
13-07046-00-00	AROMATIC PETROLEUM	SOLVENT	1,600	.2167	346.72
13-07047-00-00	ISOBUTYL ALCOHOL		73,711	.2800	20,639.08

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PRODUCT NUMBER	PRODUCT DESCRIPTION	OLD CODE	CURRENT BALANCE	ITEM COST	INVENTORY VALUE
13-07049-00-00	BUTYL CELLOSOLVE T125		74,418	2900	21,581.22
13-07078-00-00	BUTYL ALCOHOL		48,202	4050	19,521.81
13-07099-00-00	BUTYL CELLOSOLVE ACETATE		200	9100	182.00
13-07117-00-00	ETHYL BENZENE	SK# 13-32170-TT	54,996	5166	28,410.93
13-07118-00-00	N BUTYL ACETATE	SK# 13-30306-TT	48,822	4413	21,545.15
13-07121-00-00	MINERAL SPIRITS R 66		99,473	1388	13,806.85
13-07122-00-00	VH3P NAPHTHA(RULE 66)	SOLVENT	101,464	1768	17,938.84
13-07126-00-00	ISOBUTYL ACETATE		2,340	5400	1,263.60
13-09521-00-00	AMSCO HI FLASH		4,644	2204	1,023.54
13-09926-00-00	PROPASOL P	SK# 13-30612-TT	13,770	7850	10,809.45
TOTAL FOR RAW MATERIALS			4,216,415		1,885,564.47
13-12025-55-01	AROPLAZ 2477-X-65		420	4557	191.39
13-12035-00-00	BECKOSOL**12-035		68,655	4782	32,830.82
13-12052-00-00	BECKOSOL**12-052		57,314	3537	20,271.96
13-12054-00-00	BECKOSOL**12-054		57,290	3362	19,260.90
13-12054-00-01	BECKOSOL**12-054		420	3906	164.05
13-12093-00-00	BECKOSOL**12-093		43,702	3437	15,020.38
13-12102-00-01	BECKOSOL**12-102		1,260	3749	472.37
13-13031-00-00	STYRESOL**13-031		78,894	4440	35,028.94
13-13036-00-00	STYRESOL**13-036		20,860	4543	9,476.70
13-13038-00-00	STYRESOL**13-038		10,239	4998	5,117.45
13-13040-00-00	STYRESOL**13-040		17,580	4983	8,760.11
13-13040-55-01	STYRESOL**13-040		1,140	5295	603.63
13-13041-00-01	STYRESOL**13-041		4,205	4844	2,036.90
13-13042-00-00	STYRESOL**13-042		14,000	4914	6,879.60
13-13042-55-01	STYRESOL**13-042		760	5026	381.98
13-13046-00-01	LUSTRASOL**13-046		850	5487	466.40
13-13055-00-01	STYRESOL**13-055		425	4912	208.76
13-13077-00-01	LUSTRASOL**13-077		17,000	5168	8,785.60
13-13432-00-01	BECKOSOL**13-432		450	2810	126.45
13-13432-55-01	BECKOSOL**13-432		19,350	2670	5,166.45
13-13716-55-01	STYRESOL**13-716		2,000	4483	896.60
13-13802-00-00	AMBERLAC**13-802		20,360	5879	11,969.64
13-13832-57-01	POLYLITE**13-832		5,000	4240	2,120.00
13-14402-00-00	LINSEED OIL,RAW	11002	24,754	2000	4,950.80
13-14402-00-01	LINSEED OIL,RAW	11002	430	2631	113.13
13-14423-55-01	KELLOX 375		420	4465	187.53
13-14428-00-00	KELTROL 1074-60VMP	18074	68,087	4556	31,020.44
13-14428-00-01	KELTROL 1074-60VMP	18074	405	5116	207.20
13-14448-55-01	AROPLAZ 6008-X-45		41,710	4391	18,314.86
13-14477-00-00	TRI215 Z2-Z4 LINSEED	21245	71,212	4202	29,923.28
13-14481-00-00	SUPERIOR LINSEED OIL	21312	727,972	2772	201,793.84
13-14490-00-00	A-R VARN & GRINDING	21381	19,802	2816	5,576.24
13-14490-55-01	A-R VARN & GRINDING		860	3046	261.96
13-14508-00-01	KELLIN Z2	21646	440	5287	232.63
13-14521-00-00	CB-350SL	21740	26,676	3583	9,558.01
13-14545-00-01	BLEACHED FATTY ACIDS	21911	6,560	4666	3,060.90
13-14566-00-00	SYNTHENOL G-H	22215	22,615	7207	16,298.63
13-14566-55-00	SYNTHENOL G-H		41,748	6847	28,584.86
13-14576-00-00	AROPLAZ 1272	24220	42,394	4545	19,268.07

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PRODUCT NUMBER	PRODUCT DESCRIPTION	OLD CODE	CURRENT BALANCE	ITEM COST	INVENTORY VALUE
1					
2					
3					
4	13-14586-00-01	SPECIAL T-BLOWNZ2-Z4	25116	445	3944
5	13-14632-00-00	SUNFLOWER OIL FA	27115	110,017	5741
6	13-14635-00-00	AROPLAZ 310-V-50	27200	45,477	3715
7	13-14652-00-00	AROPLAZ 2477-X-65	27502	75,080	4272
8	13-14667-00-00	AROPLAZ 663-6X3-50	28098	70,772	4172
9	13-14667-00-01	AROPLAZ 663-6X3-50	28098	3,200	4738
10	13-14688-00-00	AROPLAZ 6008-X-50	28220	1,456	6701
11	13-14689-00-01	AROPLAZ 1247-T-70	28230	6,450	4378
12	13-14697-00-00	AROPLAZ 1453-X-50	28460	38,723	3386
13	13-14698-00-00	AROPLAZ 1453-6X2-50	28468	72,472	3754
14	13-14698-55-01	AROPLAZ 1453-6X2-50		410	4094
15	13-14701-00-00	AROPLAZ 6065-X-50	28880	53,303	4130
16	13-14731-00-00	AROPLAZ 6025-Z-70	33176	99,804	6355
17	13-14731-00-01	AROPLAZ 6025-Z-70	33176	470	6852
18	13-14733-00-01	AROPLAZ 5725-R-65	33178	480	6614
19	13-14734-00-00	AROPLAZ 5725-Z-65	33183	34,800	6183
20	13-14739-00-01	AROPLAZ 1351	34201	450	6749
21	13-14739-55-01	AROPLAZ 1351		3,150	6411
22	13-14748-00-00	AROPLAZ 6201-R-68	34401	2,050	1,1034
23	13-14748-00-01	AROPLAZ 6201-R-68	34401	38,700	1,1670
24	13-14748-55-00	AROPLAZ 6201-R-68		40,000	1,0483
25	13-14771-00-01	AROPLAZ 6755-A6-80	34702	8,950	9409
26	13-14792-00-00	AROPLAZ 317	63617	42,413	5549
27	13-14834-00-01	AROPLAZ 872	37429	4,800	6156
28	13-14832-00-00	AROPLAZ 5820-XE-60	39488	82,264	5123
29	13-14893-00-01	AROLON 557-B-70	42133	880	7996
30	13-14894-00-01	AROLON 559-G4-70	42134	15,750	8552
31	13-14900-00-01	AROLON 921-G4-70	43100	460	6291
32	13-14921-00-01	KELPOL 3704-V-60	47402	8,800	6087
33	13-14924-00-00	SC-3752	47802	25,000	9199
34	13-14925-00-00	KELPOL 3755-X-80	47803	23,000	6869
35	13-14956-00-01	SPENKEL F77-M-60	48275	405	4502
36	13-15022-00-01	KELPOL 835-50M	49014	800	6464
37	13-15023-00-01	KELPOL 890-60X	49028	1,750	6212
38	13-15037-00-01	AROFLINT 404-XX-60	54131	3,120	9070
39	13-15050-00-00	SC-3628-BASE		23,700	3821
40	13-15054-00-00	SC-3704-BASE	57442	19,278	4196
41	13-15123-00-00	KELSOL 3902-BG4-75	78038	-1,660	7177
42	13-15123-55-01	KELSOL 3902-BG4-75		920	7298
43	13-15127-00-01	KELSOL 3906-B2G-75	78042	5,520	7793
44	13-15127-55-01	KELSOL 3906-B2G-75		1,840	7403
45	13-15128-00-01	KELSOL 3907-B2G-75	78043	2,760	9765
46	13-15139-00-00	KELSOL 3961-B2G-75	78055	32,295	7285
47	13-15148-00-00	KELSOL 3931-WG4-45	78065	17,540	6694
48	13-15148-00-01	KELSOL 3931-WG4-45	78065	1,840	3252
49	13-15148-55-01	KELSOL 3931-WG4-45		920	3089
50	13-15150-00-00	KELSOL 3962-B2G-70	78067	97,478	7392
51	13-15150-55-00	KELSOL 3962-B2G-70		24,940	7023
52	13-15150-55-01	KELSOL 3962-B2G-70		920	7502
53	13-15159-00-00	KELSOL 3906-B2G-70	78081	43,380	7105
54	13-15160-00-01	KELSOL 3963-B2G-70	78082	1,320	9022
55	13-15163-00-01	DV-5862	78085	920	7488

842899636

PRODUCT NUMBER	PRODUCT DESCRIPTION	OLD CODE	CURRENT BALANCE	ITEM COST	INVENTORY VALUE	
1						1
2						2
3						3
4	13-15163-57-01	DV-5862	6,900	.5916	4,082.04	4
5	13-15171-00-00	KELSOL 5922-G6-70	-1,290	.8621	-1,112.11	5
6	13-15208-55-01	AROLON 970-G4-70	430	.5359	230.44	6
7	13-16902-00-00	SW 42-98-70	INTERMEDIATE	.7250	17,559.50	7
8	13-16903-00-00	SW 36-30-70	-1,820	.5244	-954.41	8
9	13-16903-00-01	SW 36-30-76	30,240	.5932	17,938.37	9
10	13-16932-00-00	S. W. 36-32-50	57,500	.3904	22,448.00	10
11	13-21500-00-00	BECKAMINE**21-500	14,611	.5309	7,756.98	11
12	13-21500-00-01	BECKAMINE**21-500	1,320	.5833	769.96	12
13	13-21500-55-01	BECKAMINE**21-500	435	.5542	241.08	13
14	13-21505-00-01	BECKAMINE**21-505	870	.4928	428.74	14
15	13-21506-00-01	BECKAMINE**21-506	870	.6499	565.41	15
16	13-21506-55-01	BECKAMINE**21-506	41,325	.6174	25,514.06	16
17	13-21510-00-01	BECKAMINE**21-510	29,920	.5468	16,360.26	17
18	13-21510-55-01	BECKAMINE**21-510	2,200	.5195	1,142.90	18
19	13-21511-00-01	BECKAMINE**21-511	3,960	.5789	2,292.44	19
20	13-21625-00-01	BECKAMINE**21-625	9,000	.6876	6,188.40	20
21	13-21625-55-01	BECKAMINE**21-625	7,650	.6532	4,996.98	21
22	13-21625-57-01	BECKAMINE**21-625	1,350	.5432	733.32	22
23	13-21627-57-01	BECKAMINE**21-627	1,755	.5052	886.63	23
24	13-21805-00-01	UFORMITE**21-805	450	.6194	278.73	24
25	13-21805-55-01	UFORMITE**21-805	9,000	.5885	5,296.50	25
26	13-21806-55-01	UFORMITE**21-806	22,750	.6036	13,852.62	26
27	13-27550-00-01	BECKAMINE**27-550	6,750	.5581	3,767.18	27
28	13-27556-00-01	BECKAMINE**27-556	6,475	.6019	3,897.30	28
29	13-27562-57-01	BECKAMINE**27-562	885	.5346	473.12	29
30	13-27566-00-01	BECKAMINE**27-566	2,175	.5484	1,192.77	30
31	13-27566-55-01	BECKAMINE**27-566	5,220	.5210	2,719.62	31
32	13-27568-00-01	BECKAMINE**27-568	475	.8691	412.82	32
33	13-27580-00-00	BECKAMINE**27-580	34,100	.6723	22,925.43	33
34	13-27580-00-01	BECKAMINE**27-580	1,350	.7262	980.37	34
35	13-27580-55-00	BECKAMINE**27-580	41,566	.6387	26,548.20	35
36	13-27580-55-01	BECKAMINE**27-580	900	.6899	620.91	36
37	13-27802-00-01	UFORMITE**27-802	1,470	.6244	917.87	37
38	13-27802-55-01	UFORMITE**27-802	7,200	.5932	4,271.04	38
39	13-27806-00-01	UFORMITE**27-806	3,325	.7023	2,335.15	39
40	13-27806-55-01	UFORMITE**27-806	12,350	.6672	8,239.92	40
41	13-27806-57-01	UFORMITE**27-806	1,740	.5548	965.35	41
42	13-27809-00-01	UFORMITE**27-809	3,150	1.0049	3,165.44	42
43	13-27809-55-01	UFORMITE**27-809	450	.9547	429.62	43
44	13-27810-00-01	UFORMITE**27-810	4,300	1.7118	7,360.74	44
45	13-27810-55-01	UFORMITE**27-810	14,100	1.6262	22,929.42	45
46	13-37140-00-01	EPOTUF**37-140	7,200	1.0893	7,842.96	46
47	13-37610-59-01	EPOTUF**37-610	410	.0000	.00	47
48	13-44362-00-00	IN-44-362(13-645)	29,320	.3750	10,995.00	48
49	13-44425-00-00	IN-44425	50,734	.3352	17,006.04	49
50	13-44429-00-00	IN-13-037-038-043	71,300	.3412	24,327.56	50
51	13-44820-00-01	IN-21-805-806	7,964	.3965	3,157.73	51
52	13-47502-59-01	AQUAPRENE 8150	400	.0000	.00	52
53	13-90017-57-01	INTERMEDIATE 90-017	5,590	.7224	4,038.22	53
54	13-90031-00-01	STA-CLAD ATP-101	450	.6905	310.73	54
55	13-90063-00-01	KELSOL 3990-B2G-70	900	.8622	775.98	55
56						56
57						57

FORM NO. 3-84

PRINTED IN U.S.A.

842899637

PRODUCT NUMBER	PRODUCT DESCRIPTION	OLD CODE	CURRENT BALANCE	ITEM COST	INVENTORY VALUE
13-90205-00-00	KELPOL**3755-XK1-75	EA6229	6,260	8477	5,306.60
13-90280-00-00	KELPOL 3853-K3-75		40,140	6429	25,806.01
13-91007-00-00	SYNTHENOL Z2-Z2	MODIFIED OIL	6,500	8555	5,560.75
13-92718-00-01	BECKOSOL**92-718		2,120	6784	1,438.21
13-92766-00-01	LUSTRALITE**92-766	SYNTHETIC RESIN SOLU	500	1,4029	701.45
13-92794-55-01	BECKAMINE**92-794		450	9741	438.35
13-92805-00-00	BECKAMINE**92-805	SYNTHETIC RESIN	75,028	8765	65,762.04
13-93210-00-00	BECKAMINE**93-210		68,021	5054	34,377.81
13-93231-00-01	BECKAMINE**93-231	BUTYLATED	450	6475	291.38
13-93238-00-01	BECKAMINE**93-238		3,150	1,3060	4,113.90
13-93661-00-00	BECKOSOL**93-661		72,946	3510	25,604.05
13-93899-00-01	HECKOSOL**93-899		25,600	8286	21,212.16
13-93901-55-01	BECKOSOL**93-901		450	1,0480	471.60
13-93925-00-00	EPOTUF**93-925		97,513	5994	58,449.29
13-93981-00-01	EPOTUF**93-981		1,840	5057	930.49
13-93989-00-01	LUSTROSOL**93-989	ACRYLIC RESIN SOLU I	1,275	5437	693.22
13-93997-00-01	IN-93-997(93981)	INTERMEDIATE	9,860	1,0473	10,326.38
13-95848-00-01	CELLOKID**92		850	0539	45.82
13-95939-00-01	CELLOKID**6155-X		450	3960	178.20
13-95939-55-00	CELLOKID**6155-X		13,366	3250	4,343.95
13-95975-00-01	CELLOKID**6655-V66		760	6153	467.63
TOTAL FOR FINISHED GOODS			3,748,955		1,861,641.47
13-00014-90-00	RECON CH UL DRUM		62	17,5000	1,085.00
13-00138-90-00	LINED FIBRE DRUM		183	13,2500	2,424.75
13-00500-90-00	DRM SEG CH N L 17E	SK# 13-8451A-PA	339	21,0500	7,135.95
13-00508-90-00	DRUMS (EMPTY)		389	24,1300	9,386.57
13-00509-90-00	DRM SEG CH N UL 17E	SK# 13-8454A-PA	1,376	18,6500	25,662.40
TOTAL FOR CONTAINERS			2,349		45,694.67
TOTAL FOR PLANT 13			7,967,719		3,792,900.61

*Handwritten signature*

842899638

Sample Labeled 1/16/92 JMB -  
Samples of Clothing

Samples appear to be impregnated  
with some material.  
Can we identify it. It is  
probably either N-butyl acrylate  
monomer or a polymerized  
version of the same.

Sample Labeled: Monomer Mixture Task 119, 1/16/92 J. Cherry, M. Bowles

We need to know the monomers  
present and the inhibitor  
levels.

We think we have the  
following things present.

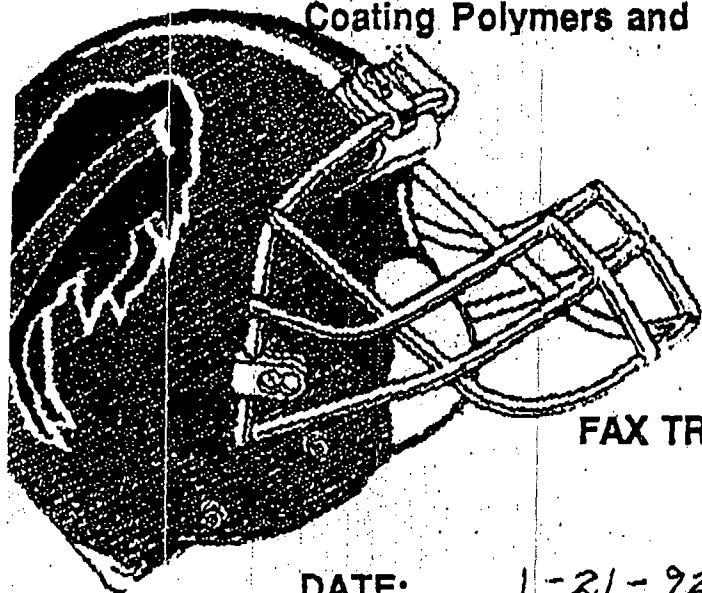
Methyl methacrylate  
styrene  
hydroxy ethyl acrylate  
glacial acrylic acid  
N-butyl acrylate

Mixture is  
~~possibly~~ possibly partially polymerized.  
We would like to know extent of  
polymerization, if any.

Call Jimmy Cherry 201-589-3709

He is waiting for the results  
so he can determine disposition  
of tank contents and potential  
hazards. Please let him  
know ASAP.

**Reichhold Chemicals**  
**Coating Polymers and Resins Division**



Reichhold Chemicals  
4201 Genesee Street  
Box 210  
Buffalo, NY 14225

TEL: (716) 626-2000  
FAX: (716) 626-2013

**FAX TRANSMISSION**

DATE: 1-21-92

NO. OF PAGES (INCL. COVER): 1

TO: Reichhold Newark Doremus

FAX NO. 201-817-9113

ATTN: Jim Chang ; Mike Bowers

FROM: R. A. Foss

MEHQ Level in Tank 119

is 122 ppm ; duplicate  
determination 123 ppm

## SPENCER KELLOGG RESEARCH CENTER

0-251

## SPECIAL ANALYTICAL SERVICES REQUEST FORM

Date 1-17-92

Request Approved By \_\_\_\_\_

Submitted By Newark

Analytical Dept. \_\_\_\_\_

Est. Time Required \_\_\_\_\_

Program Number \_\_\_\_\_

Est. Cost of Service \_\_\_\_\_

Date Required \_\_\_\_\_

Identification of Samples: Information Supplied by Requisitioner  
(Number and Description)

- 1) Monomer tank 119
- 2) 1/16/92 JMB sample of clothing

Information Desired:

- 1) % composition monomer mix  
% inhibitor
- 2) What is clothing impregnated with?

(Below this line for Analytical Department use only)

Conclusions Reached:

- 1) Tank 119  
16.3% acrylic acid  
10.0% Hydroxyethyl acrylate  
55.7% methylmeth acrylate  
18.0% styrene  
0% n-butyl acrylate  
inhibitor content being done @ Pensacola  
ans. 1-21-92
- 2) Clothing - impregnated with polymerized n butyl acrylate; no free butyl acrylate monomer present

Total Time Spent 14 hrCost of Service \$1750

842899642

REICHHOLD CHEMICALS, INC — EMULSION POLYMERS DIVISION  
ANALYTICAL REPORT 92-092

SUBMITTER: Chang, J. ~~8-77-92~~ DATE SUBMITTED: 01/24/92  
PROJECT #: 111-0003 DATE COMPLETED: 01/29/92  
COPIES TO: Campbell, J Grossman, J Sadler, C  
ANALYST(S): Gunter, P. Truitt, P  
SAMPLE(S): T-119

BACKGROUND

This sample is from a holding tank at Neume Daremus that is believed to contain unreacted monomers. We need to know inhibitor levels in the sample in order determine how the sample will be handled henceforth. We also need to know the approximate monomer ratio to determine whether stratification has occurred. We believe the following monomers and monomer contents are present:

<u>MONOMER</u>	<u>APPROX. %</u>
Methyl methacrylate	33
Styrene	10
Hydroxy ethylacrylate	7
Acrylic acid	10
* N Butyl acrylate	40

\* Sample may not contain N Butyl acrylate.

WORK REQUESTED

1. Monomers
2. Monomer content
3. Inhibitor content

RESULTS

POLYMER CONTENT:

None detected.

Method used: Rohm & Haas method "Determination of traces of polymer in monomer" using methanol as a solvent.

INHIBITOR CONTENT:

120 PPM. MEHQ



Method used: Rohm & Haas method where MEHQ reacts with nitrous acid to form a nitroso derivative, a yellow compound measured at 420 nm.

Note: The tertiary butyl catechol in styrene (amounts to 2.5 ppm in this mixture) was not successfully separated and is not included with the MEHQ content.

#### MONOMERS AND MONOMER CONTENT:

Methods used: GC, FTIR, and Titrations.

Monomer and monomer contents are listed as follows:

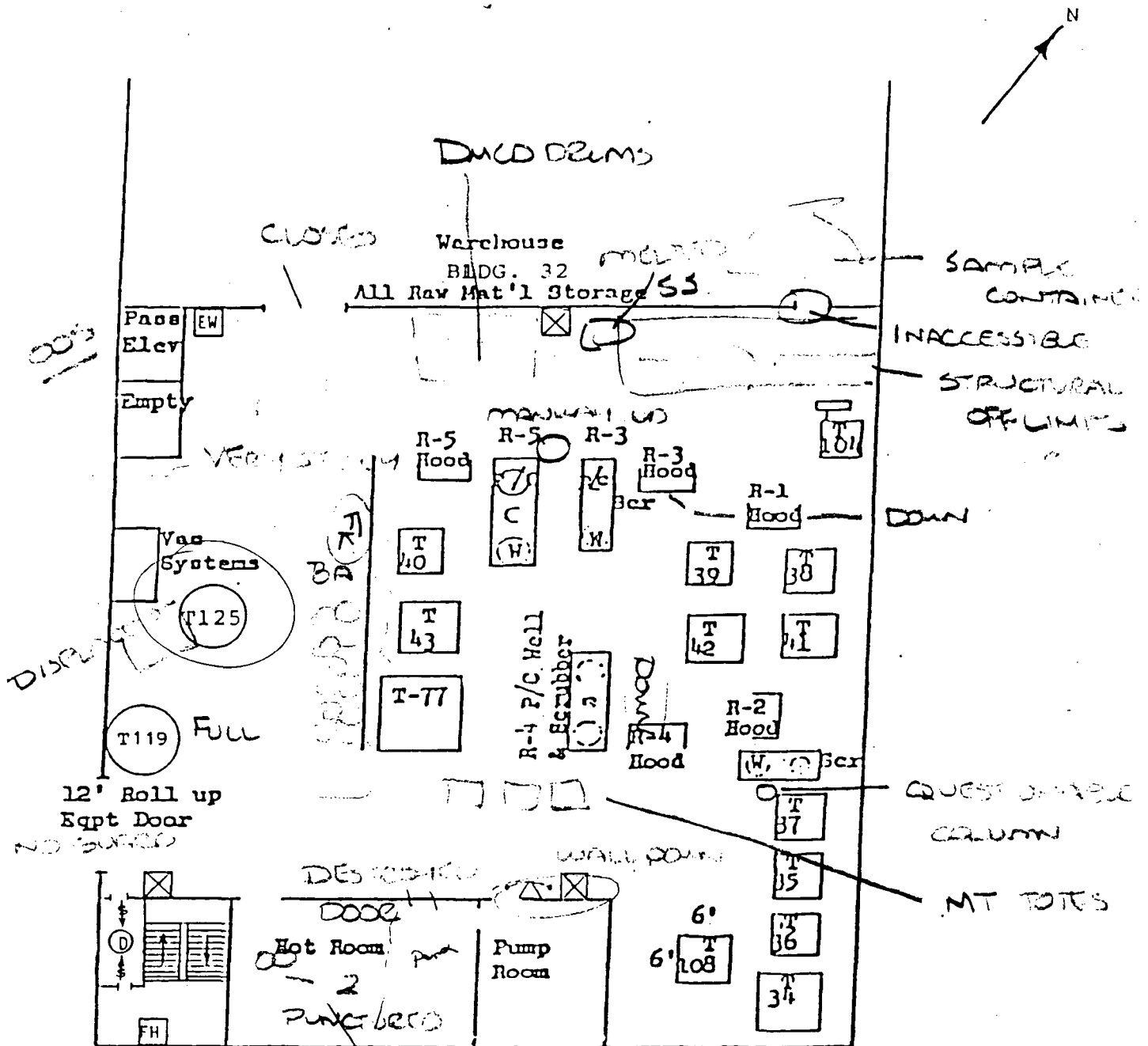
<u>monomer</u>	<u>%</u>
Methyl methacrylate	51
Styrene	17
Hydroxy ethylacrylate	12
Acrylic acid	20
N-Butylacrylate	nd

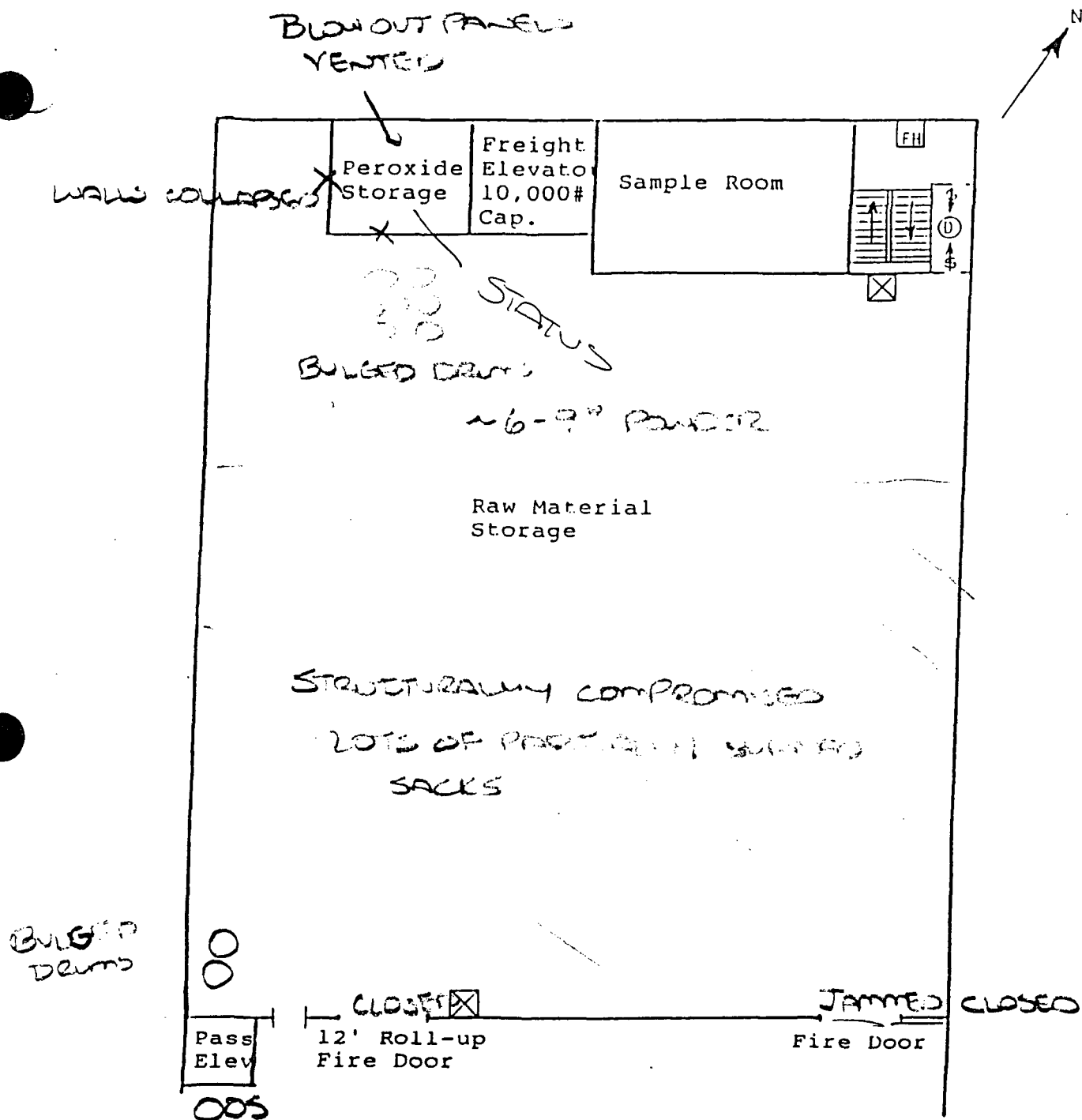
Limits of detection for BA = 1%

NOTE: The sample was slightly off color (yellow) when received and turned black within three days. The change in color was caused by the acrylic acid reacting with the tin container used for shipment. I will add approximately 10,000 ppm MEHQ to the sample and transfer the sample to a plastic container for proper disposal.

CONCLUSION: Butyl acrylate has not entered the premix tank T119. The monomers do not appear to have stratified. No polymerization has occurred and the inhibitor level is approximately in specifications.

— END OF THE REPORT —

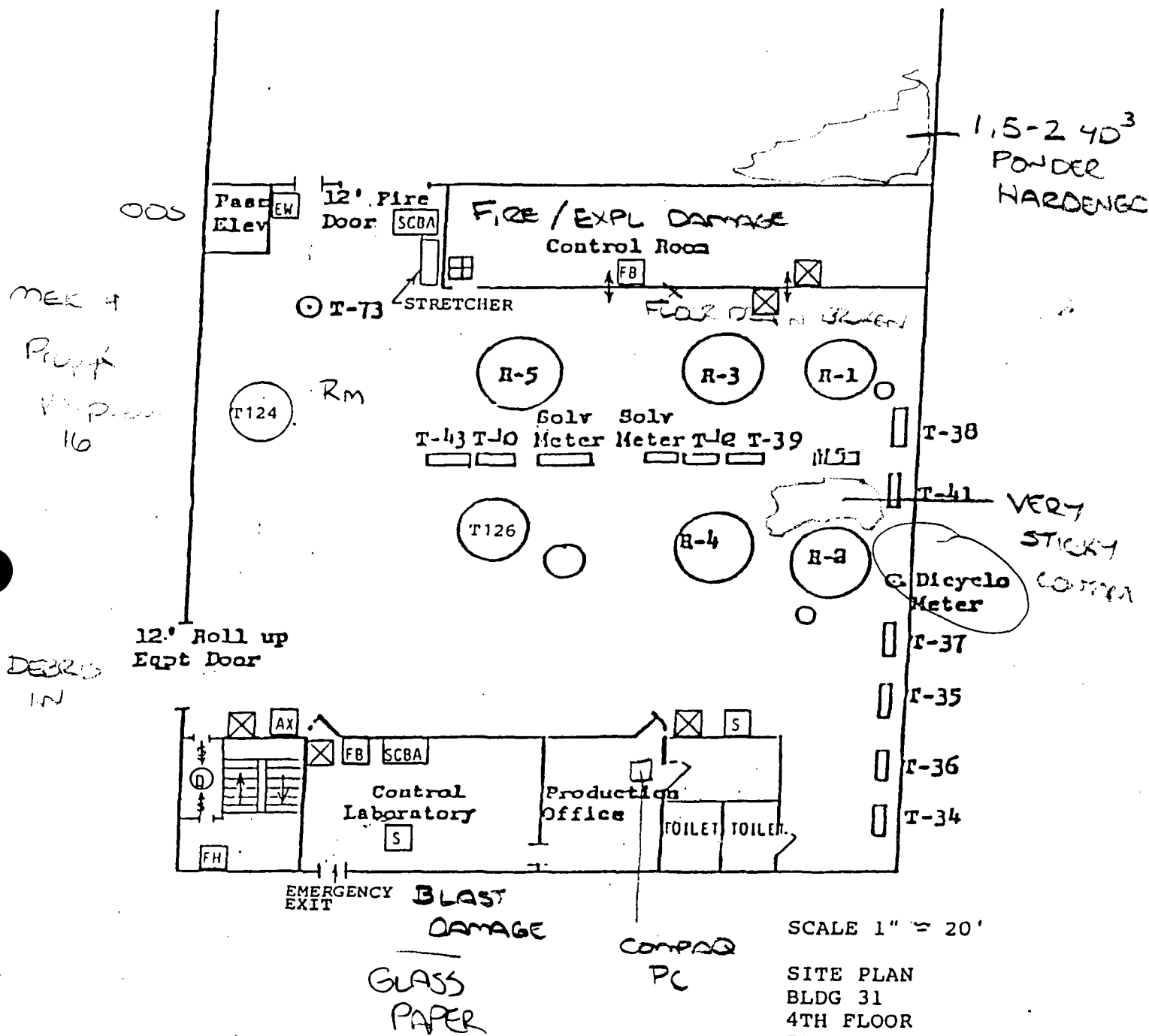
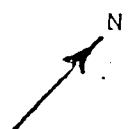




SCALE 1"=20'

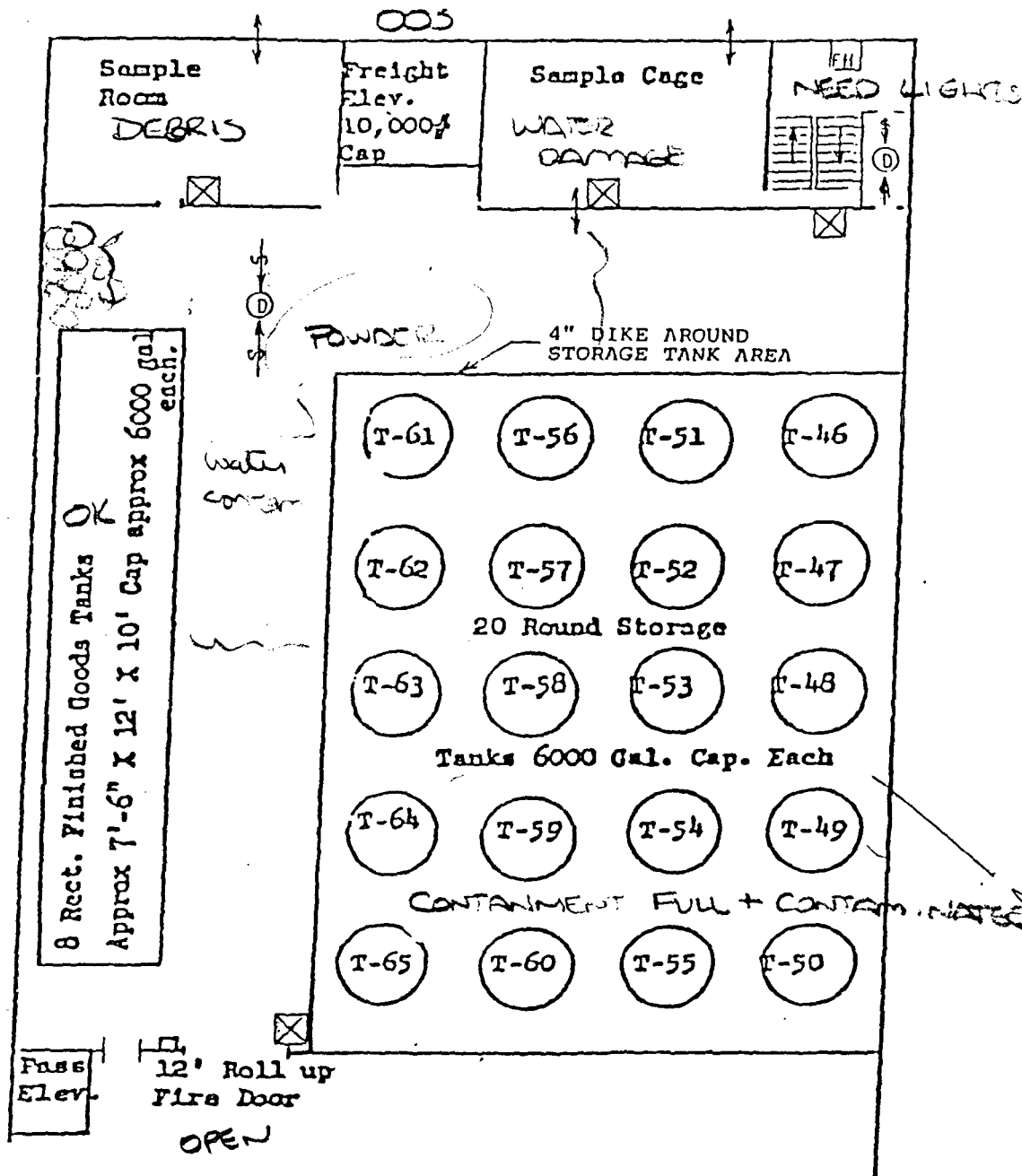
SITE PLAN  
BLDG. 32  
5th FLOOR

REICHOLD CHEMICALS, INC.  
400 DOREMUS AVENUE  
NEWARK, NJ



SCALE 1" = 20'

SITE PLAN  
BLDG 31  
4TH FLOOR  
REICHOLD CHEMICALS, INC  
400 DOREMUS AVENUE  
NEWARK, NJ



21 Lithium  
ten-cem

more used  
Lithium reactant  
ethylene glycol ethylene  
ethylene glycol

SCALE 1"=20'

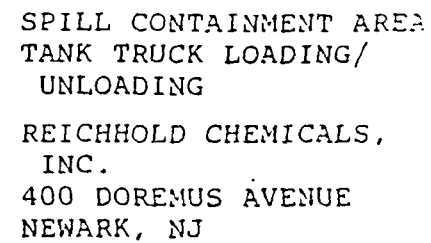
SITE PLAN  
BLDG. 32  
4th FLOOR

REICHOLD CHEMICALS, INC.  
400 DOREMUS AVENUE  
NEWARK, NJ

SHEET 21 OF 23

842899648

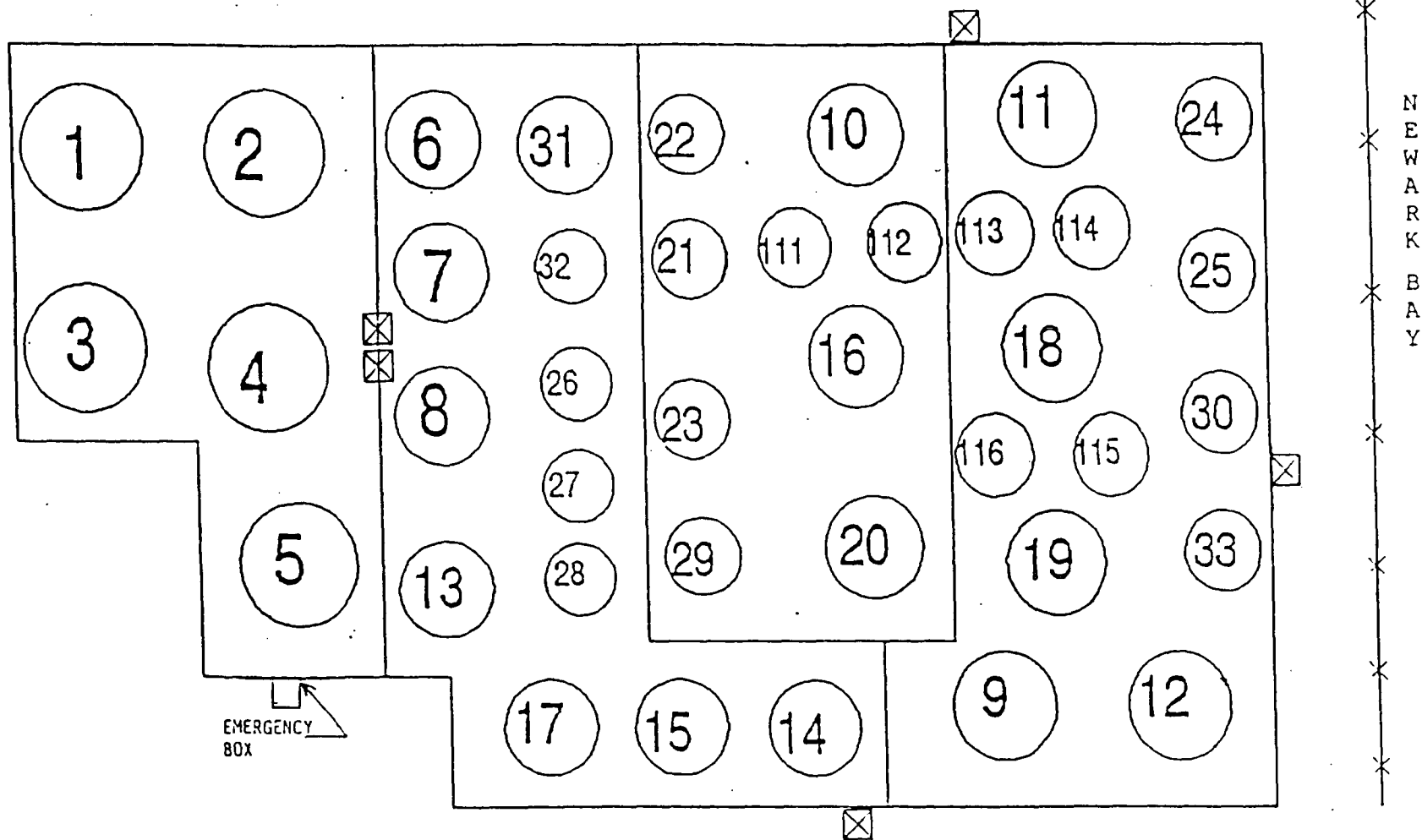
**SHEET 23 OF 23**



842899650

SHEET 17 OF 23

# BLDG. 31 TANK FARM



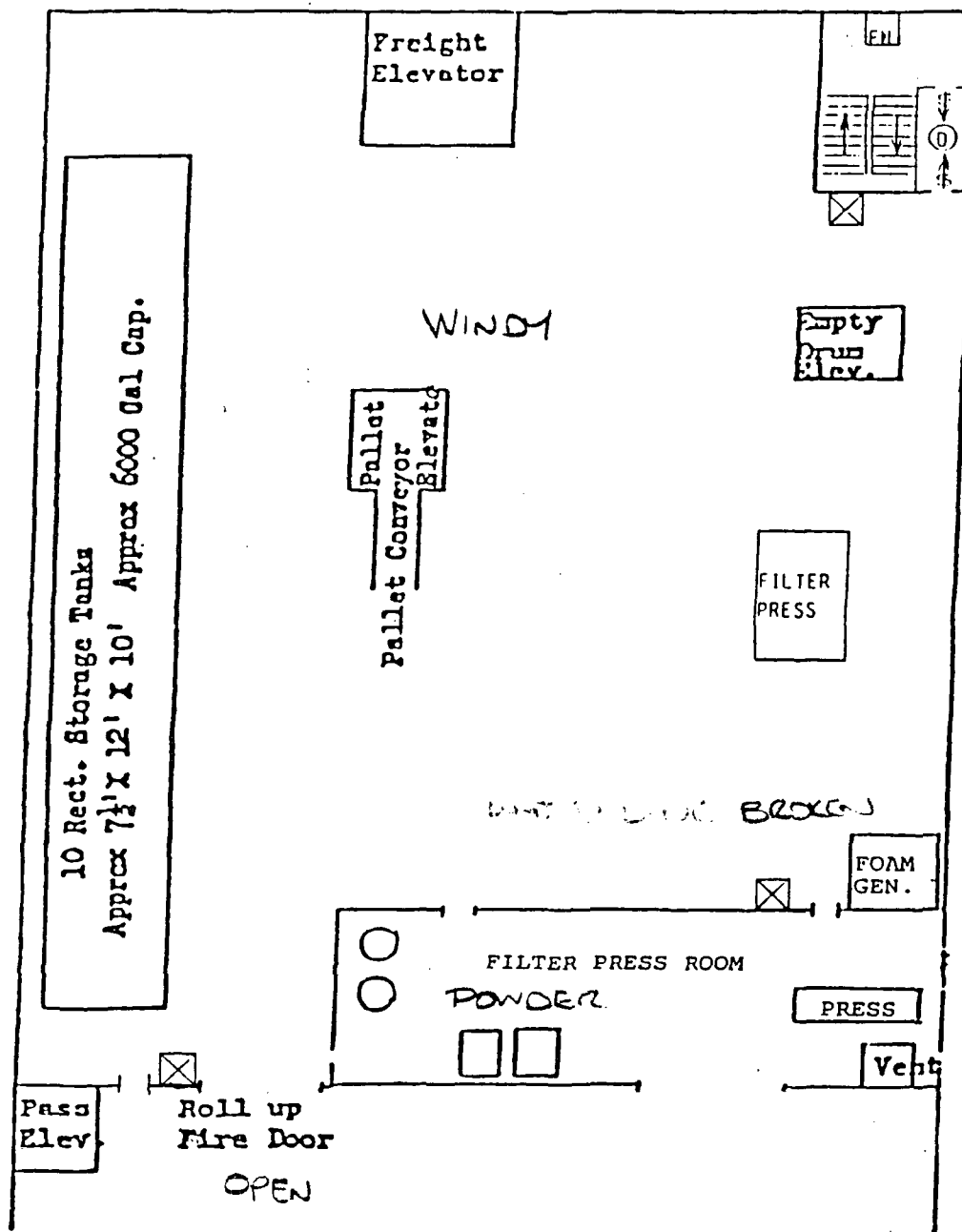
SCALE 1"=25'

SITE PLAN  
BLDG. 31  
TANK FARM

REICHOLD CHEMICALS, INC  
400 DOREMUS AVENUE  
NEWARK, NJ



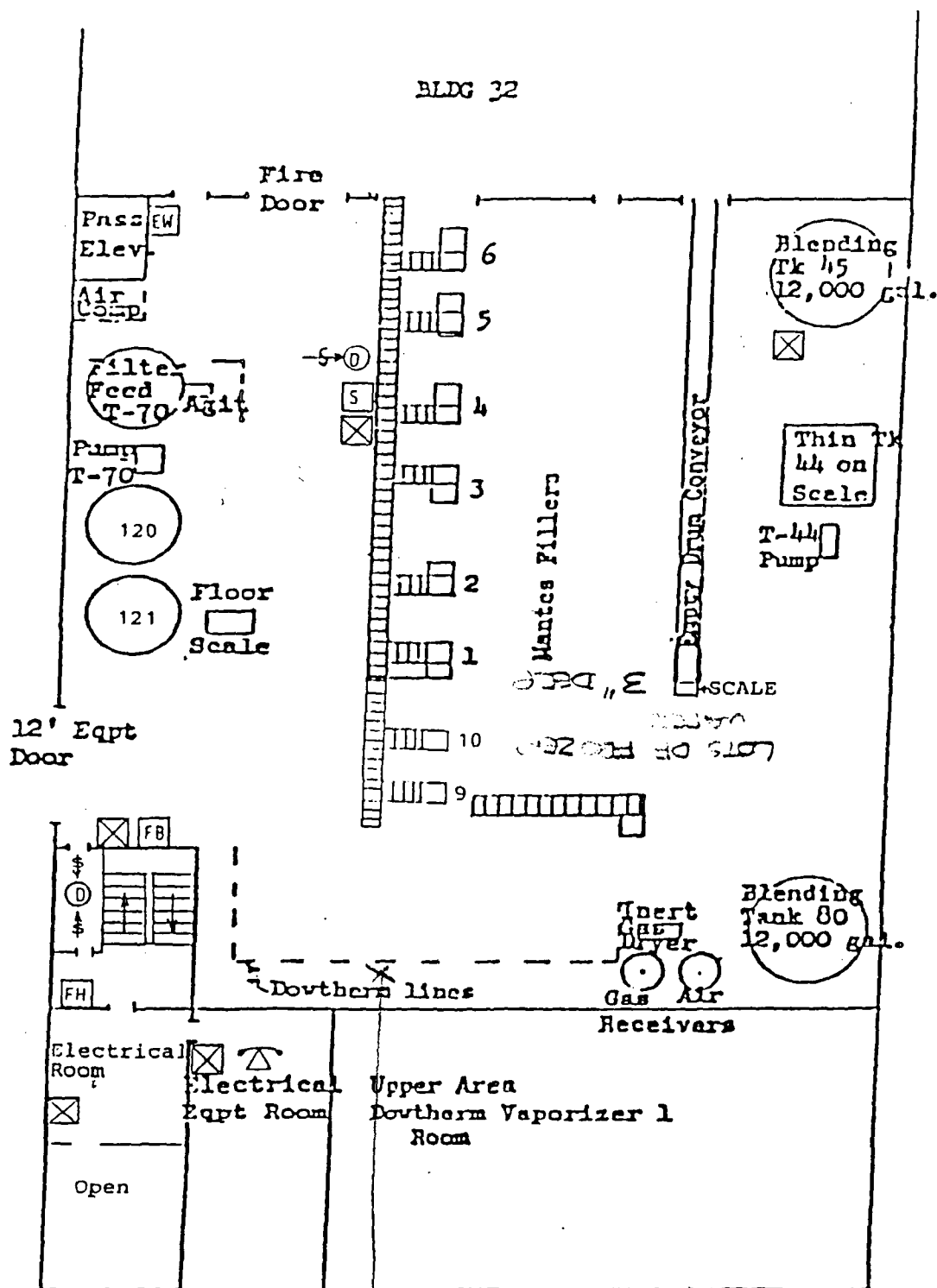




SCALE 1"=20'

SITE PLAN  
BLDG. 32  
3rd FLOOR

REICHOLD CHEMICALS, INC.  
400 DOREMUS AVENUE  
NEWARK, NJ



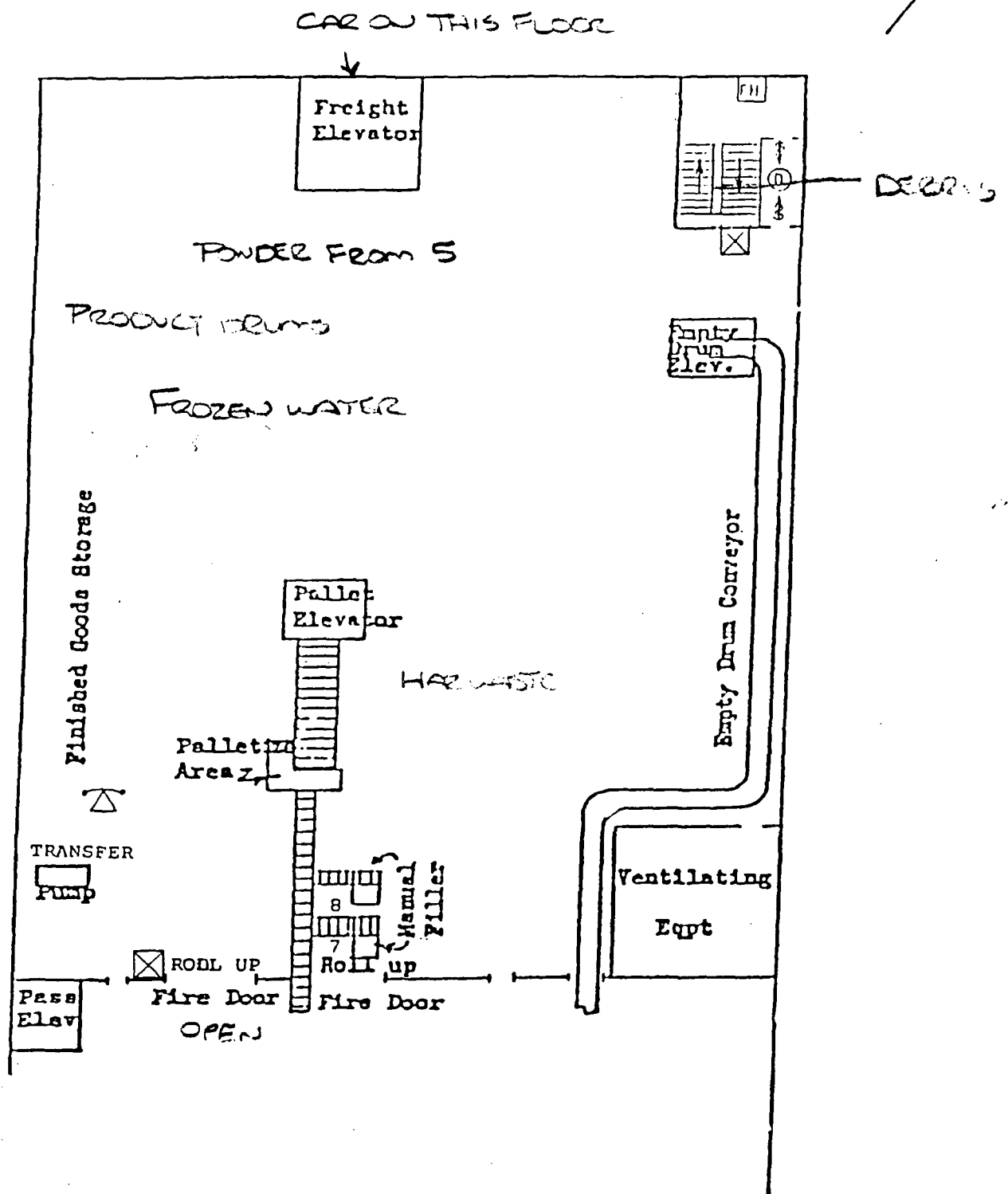
SCALE 1"=20'

SITE PLAN  
BLDG. 31  
2nd FLOOR

REICHOLD CHEMICALS, INC.  
400 DOREMUS AVENUE  
NEWARK, NJ

SHEET 13 OF 23

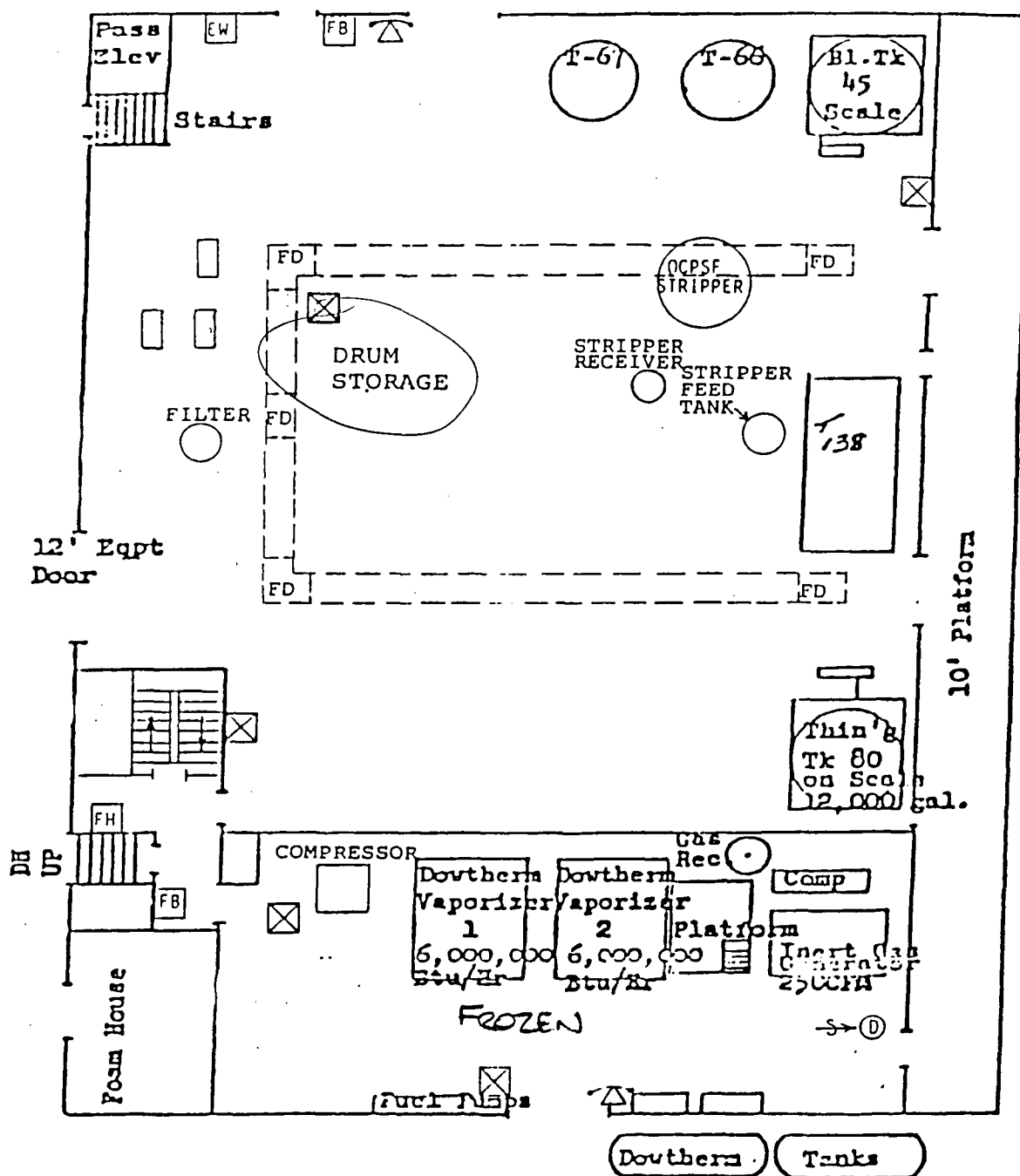
842899653



SCALE 1"=20'

SITE PLAN  
BLDG. 32  
2nd FLOOR

REICHOLD CHEMICALS, INC.  
400 DOREMUS AVENUE  
NEWARK, NJ



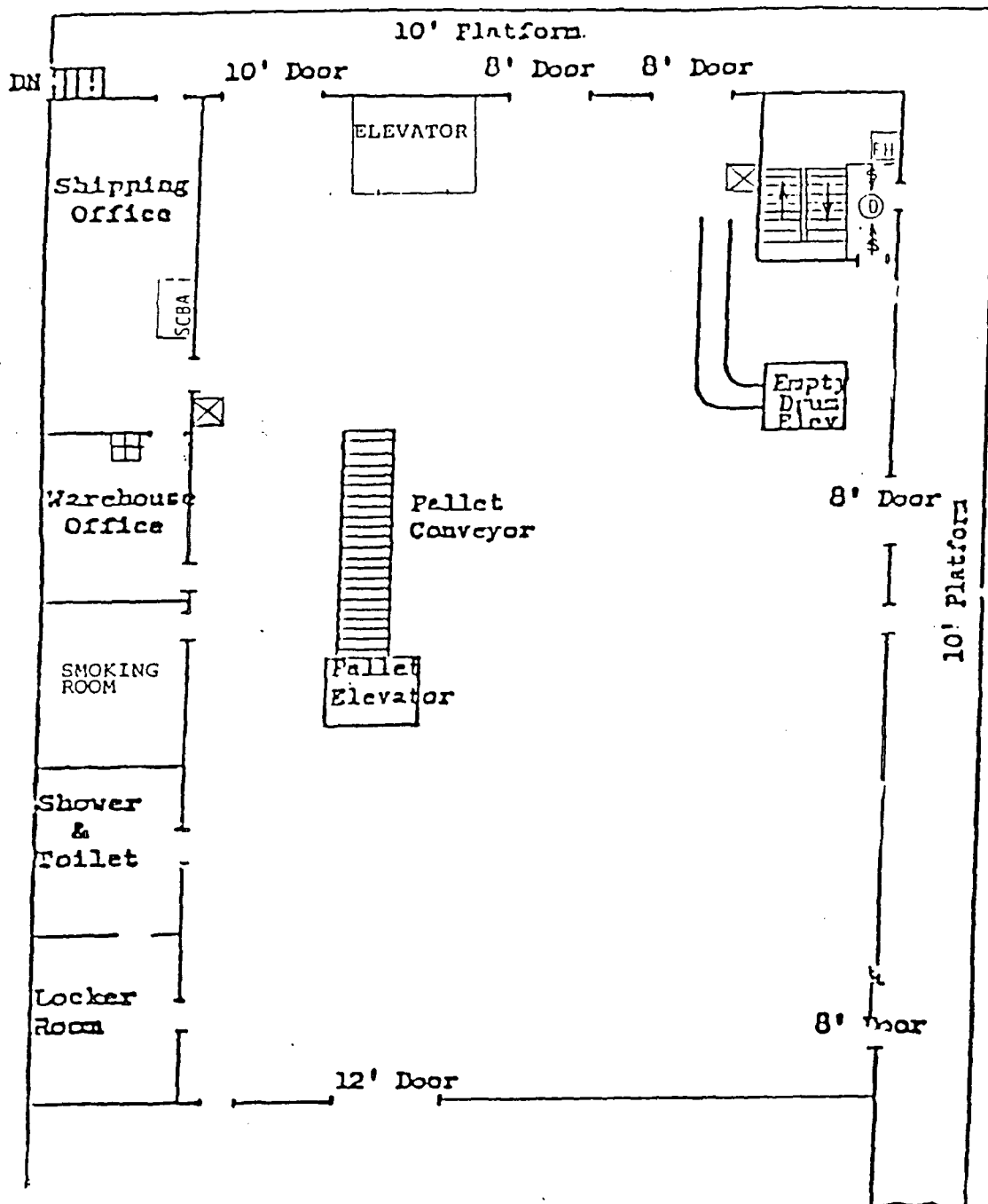
SCALE 1"=20'

SITE PLAN  
BLDG. 31  
1st FLOOR

REICHOLD CHEMICALS, INC.  
400 DOREMUS AVENUE  
NEWARK, NJ

SHEET 12 OF 23

842899655



SCALE 1" = 20'

SITE PLAN  
BLDG. 32  
1st FLOOR

REICHOLD CHEMICALS, INC.  
400 DOREMUS AVENUE  
NEWARK, NJ

redi-letter

CA.

Jim Chang

FROM

Art Dieffenbach

SUBJECT

Bldg 31 Entry

DATE

11/16/92

MESSAGE

Fred Malczuk and I need permission to enter Bldg 31, 1<sup>st</sup> and 2<sup>nd</sup> floors in order to do the following:

1. Establish power supply to Don't therm Vaporizers
2. Establish power supply to lift truck battery charger & put 2 lift trucks on charge
3. Establish air supply to Don't therm Vaporizers
4. Inspect steam distribution system to determine what could be done to supply steam to the tank farm and prevent freeze up & bursting of active steam pipe.

Request your approval:

We plan Tyvek suit, respirator hood & safety glasses. Organic vapor & asbestos cartridges.

SIGNED

Art Dieffenbach

ORM 45 468  
(50 SETS) 4P468  
bonless

☐

NO REPLY NECESSARY

☐

REPLY REQUESTED - USE REVERSE SIDE

842899657

## REICHHOLD

---

### interoffice communication

TO: L. Loh - RTP FROM: R. P. Aston *RP Aston*

PC: R. Arnott - RTP LOCATION: RTP  
J. Chang - RTP 450  
V. Karode - RTP  
C. Lorelli - RTP DATE: February 3, 1992  
B. Naujelis - Newark (D) SUBJECT: Doremus Property  
J. Polley - RTP Damage - Insurance  
N. Prato - RTP Claim - Work Plan  
T. Rhyne - RTP  
K. Taylor - Newark (D)  
A. Vickers - RTP

Meetings were held in the Newark - Doremus Ave. Plant, January 29-31, to assess the current status of property damage remediation activity and to develop a work plan for ongoing activities to clean up the damaged property and settle the insurance claim.

The CPR Division Team,

Bob Aston - Engineering/Team Leader  
Vik Karode - Finance  
Bob Naujelis - Environmental  
Kent Taylor - Site Management

met with various personnel during the period including:

John Mnych - O'Brien & Gere Engineers (OB&G), Site Engineer  
Don Stone - OB&G Project Manager  
Neil Wilkinson - OB&G Toxicologist  
Bob McGuckin - IRI Senior Adjuster  
Jim Chang - RCI Corporate Safety  
Cronin Co. Representatives - Salvage Contractor for IRI  
Various RCI - Doremus Employees

Results of the meetings are as follows:

- The current status was assessed and is indicated in the attached work plan.
- The definition of work phases was clarified and used as the basis to develop the attached work plan.
- The attached work plan also includes time schedule information for the clean up phases.

- The attached work plan was generally discussed with IRI Senior Adjuster, Bob McGuckin, who is generally in agreement with it. A commitment was made to furnish Bob McGuckin with a finalized written copy of the work plan by Feb. 5, after review and approval by Julie Polley, RCI Risk Manager.
- The decision was made to train Art Dieffenbach and Fred Malchuk in addition to Kent Taylor and Bob Naujelis (40-hour HAZWOPER training) to enable Art and Fred to begin visual damage assessment activities during the Phase II clean-up.
- O'Brien and Gere Engineers was authorized to proceed with preparation of a bid document package to be used to obtain competitive bids for Phase II clean-up work.

The attached work plan is an overall outline of the work to be performed. Each item in the plan will be further defined and detailed as the work progresses.

RPA:rh

Att.



Work Plan for Reichhold - Doremus Ave.  
Property Damage Clean-up and Repair  
February 3, 1992

Phase I - Emergency Response

This phase includes initial response and activities necessary to make the buildings structurally safe to conduct further clean-up activities. All work will be performed with entire 31 & 32 Buildings classified at Level - C.

1.1 *Initial Response and Assessments to Jan. 10, 1992 Fire*

1.11 Health & Safety plan established by RCI/O'Brien & Gere (OB&G) - 1/12.

1.12 Structural inspection made by OB&G on 1/16. Limited structural report/recommendation made on 1/21.

1.2 *Sensitive Material Removal*

1.21 Peroxide removal from 32-5 by OHM and their subcontractor AETC completed 1/24.

1.22 Removal of bulged drums from 32-5 and 31-5 by OHM/AETC completed 1/24.

1.23 Removal of monomer from TK-119 in 31-5 by OHM/AETC completed 1/31.

1.3 *Perform recommended shoring of roof & columns in 31-5 & 32-5 OHM contracted to do work begin 2/3, complete 2/14.*

1.31 Removal of 32-5 materials during shoring operation by OHM concurrent with shoring.

1.32 Segregation of salvageable material as it is removed. Determination to be made by Cronin Co. visually. Material for potential salvage to be held in 32-1 until decontaminated and removed from building. Cronin to further assess and remove from site if salvageable; otherwise, to be added to scrap material held in roll-off bins for proper waste disposal.

1.4 *Remove or stabilize section of north parapet wall near the junction of 32-5 and 31-5 roof.*

1.41 OB&G requested to re-check parapet wall and recommend action by 2/5. Action to be determined by 2/7 and conducted by 2/14, if required.

## Phase 2 - Hazardous Material Containment and Removal

This phase will accomplish all necessary tasks to achieve the re-classification of the entire Buildings 31 & 32 from Level C to Level D. All work performed during this phase therefore must be conducted by Level C trained and equipped personnel.

- 2.1 *Initiate preparation of a bid document package to obtain competitive bids for Phase 2 work. OB&G was authorized to begin this work on 1/31. Bid package to be complete on 2/14. Review by RCI and IRI during week of 2/17. Contractors to receive request for bids by 2/20. Bids due by 2/27.*
- 2.11 Evaluate bids for Phase 2 work and contract work by 2/28.
- 2.12 Phase 2 - contract work to begin week of 3/2.
- 2.13 Target completion of Phase 2 work by 4/10.
- 2.2 *Investigation of a lightweight membrane roof structure to cover Bldgs. 31 & 32 to be made for feasibility, cost and availability. OHM to make recommendation week of 2/3. Target to install week of 2/17, if feasible. Purpose is to stop water entry through fractured roof into Bldgs. 31 & 32 to minimize further migration of materials through the building and prevent material from getting out of the buildings.*
- 2.3 *Clean-up and containment of materials during Phase 2.*
  - 2.31 Encapsulation or removal of asbestos containing materials (ACM).
  - 2.32 Removal of hazardous raw material and product from Buildings 31 & 32. All materials which are not contained by bulk storage tanks/vessels or piping will be removed.
  - 2.33 Contaminated water will be removed.
  - 2.34 Bulk tanks/vessels and piping containing viscous product which cannot be removed without heating will be inspected to ensure there are no leaks and left for removal during Phase 3.

- 2.4 Detailed visual damage assessment will be conducted by Art Dieffenbach and Fred Malchuk during Phase 2.
- 2.41 A visual damage report will be made and distributed to RCI and IRI.
- 2.42 Report will be segregated into two sections as requested by IRI.
- a. Basic Building/Structural
  - b. Machinery and Equipment

### Phase 3 - Damage Assessment and Completion of Material Removal

All work performed beginning in Phase 3 will be with Buildings 31 & 32, re-classified to Level D.

- 3.1 Preparation of a bid document package to obtain competitive bids for damage repair/replacement. To be prepared by OB&G Engineers beginning during Phase 2 to coincide with visual damage report information and carrying into Phase 3 as heat, electricity and other utilities are restored to Buildings 31 & 32. Target for completion of bid package is 5/7.
- 3.11 Review and agreement with IRI on scope of damages to physical property. Target completion by 5/14.
- 3.12 Contractors to receive request for bids by 5/15. Bids due by 5/27.
- 3.2 Restoration of basic utilities to Buildings 31 & 32. Target completion 4/15.
- 3.3 Completion of material removal utilizing Reichhold and contract personnel and utilities (steam and electricity). Target completion 5/15.
- 3.4 Completion of damage assessment to be made by Reichhold personnel as tanks/vessels and piping are cleared and electrical instruments and equipment are able to be re-powered for check-out. Target completion 4/30.

### Phase 4 - Determine Actual Cash Value of Insurance Claim

- 4.1 Evaluation of repair/replacement bids by RCI and IRI. Target completion by 6/4.

4.2 *Determination of replacement cost by RCI and IRI. Target completion by 6/9.*

4.3 *Determination of actual cash value by RCI and IRI. Target completion by 6/15.*

Phase 5 - Repair/Replacement

5.1 *Determination of any modifications to repair/replace plans as previously bid during Phase 3.*

5.11 *Selection of repair/replacement contractor.*

5.12 *Negotiate modifications.*

5.2 *Award contract and conduct repair/replacement work.*

Phase 6 - Commissioning and Start-up

*Further details of latter phases to be developed as project progresses.*

**Reichhold Chemicals, Inc.**

Corporate Headquarters

PO Box 15582

Charlotte, N.C. 27709-3582

Copy A. Vickers  
A. Gray  
J. Polley

January 21, 1992

**REICHHOLD**

Mr. Charles E. Fitzsimmons  
U.S. Environmental Protection Agency, Region II  
Emergency Response Branch  
Woodbridge Avenue  
Edison, NJ 08837

Re: Removal Activities  
Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey

File: 5395.001 #2

Dear Mr. Fitzsimmons:

This letter serves to address the Notice of Release and/or Threatened Release of Pollutants, Contaminants, and/or Hazardous Substances as defined by the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) issued on January 17, 1992 by the United States Environmental Protection Agency (EPA). As requested by the EPA, this letter identifies removal activities planned by Reichhold Chemicals, Inc. (Reichhold) at their facility on 400 Doremus Avenue in Newark, New Jersey in response to an explosion and fire which occurred on Friday, January 10, 1992 at approximately 11:30 p.m.

The incident occurred at the referenced facility in a five-story brick and concrete structure divided by a partitioning wall. These two sections are identified as Buildings 31 and 32 and, at the time of the accident, were utilized for the production and limited storage of resins. The explosion and fire was centered around one vessel, T-125, located on the fifth floor of Building 31. The explosion damaged the fifth floor of Building 31 with the ensuing fire causing damage to the material storage area on the fourth and fifth floors of Building 32.

Raw materials were stored on the fifth floor of Building 32, including drums of peroxides. The interior walls surrounding these peroxides also suffered damage. The structural integrity of this area along with the condition of the peroxides is currently under investigation.

Reichhold, in conformance with 42 United States Codes (U.S.C.) 9601(23), plans the following Phase I removal activities to monitor, assess, and evaluate the release or threat of release of hazardous substances, the disposal of removed material and the taking of such actions as may be necessary to prevent, minimize, or mitigate damage to the public health or welfare or to the environment, which may otherwise result from the release. Reichhold has retained the services of O'Brien & Gere Engineers, Inc. (O'Brien & Gere), OHM Remediation Services Corporation (OHM), and Advanced Environmental Technology Corporation (AETC) to assist in the Phase I investigation and remediation activities.

842899664

A team of engineers and scientists from O'Brien & Gere met with representatives from Reichhold at the facility on Sunday, January 12, 1992 to conduct a preliminary site inspection following the fire. Members of the investigation team included Environmental Managers, Process, Structural, and Construction Engineers along with a Hydrogeologist and a Toxicologist. The preliminary inspection was performed to determine the initial extent of the explosion and fire and to identify and characterize any immediate impact or threat of release at the site.

Upon completion of the preliminary inspection, O'Brien & Gere completed a Phase I Health and Safety Plan (HASP) and a structural review of the integrity of the fifth floors of Buildings 31 and 32. OHM and AETC have been contracted to begin work to prevent any further impact to the local environment from the incident and to mitigate the existing threat of release and begin the cleanup and removal of debris from the site.

OHM and AETC, the remediation contractors, mobilized to the site on Friday, January 17, 1992. Once the contractors had completed set-up of their field offices, safety controls and preliminary safety meeting, the general cleanup was begun. OHM employees began cleanup of objects protruding from the structure such as window frames, glass panes, loose asbestos containing materials (ACMs), and miscellaneous hazards. The removal of the reactive peroxides which are possibly shock sensitive, including visibly bulged drums and Tank 119 located on the fifth floors, have been identified as a high priority. Removal of the shock-sensitive materials is scheduled to begin on January 22, 1992. This task will be performed by AETC whose reactive specialist personnel have the expertise and equipment to stabilize the material on-site and then arrange for off-site disposal.

Once the reactive materials have been safely removed and stabilized, the entire fifth floor area will be prepared for the installation of a vertical frame shoring system that will be required to support the damaged roof.

Following the removal of miscellaneous debris, OHM began conducting a general product inventory of the materials on the first, second and third floors in Buildings 31 and 32. The survey began on the ground floors and proceeded to the third floors which were surveyed last. A detailed inventory of the fourth and fifth floors consisting of the location of each drum, bag or portable tank whether loaded, full or empty, any labeling or identification, their locations relative to the floor plan and their conditions will be completed during Phase II activities.

After completion of the inventory, removal of the salvageable materials from the first three floors will begin. O'Brien & Gere and Reichhold personnel will determine suitable storage for this material or determine if it should be disposed of as a waste in compliance to local, state and federal guidelines. General cleanup of the first three floors will coincide with the removal of the raw and finished product.

Remedial activities at the Reichhold, Newark, New Jersey facility will be completed in as timely a manner as safety and prevailing weather conditions permit. O'Brien & Gere, working in close association with Reichhold at both the facility and corporate levels, will oversee the

Mr. Charles E. Fitzsimmons  
January 21, 1992  
Page 3

Phase I removal of any released hazardous substances which resulted from the incident on January 12, 1992, by OHM Remediation Services and their specialty subcontractor, Advanced Environmental Technology. Upon completion of these remedial activities, O'Brien & Gere will begin supplemental, Phase II activities which will include a comprehensive investigation and characterization which will determine the presence of any prevailing physical impact to Buildings 31 and 32 and the immediate area. This will include the cleanup and removal and, if necessary, the disposal of materials from the fourth and fifth floors.

Should the EPA need any further information detailing the removal activities for this incident, please feel free to contact me at (919) 990-7570.

Very truly yours,

REICHHOLD CHEMICALS, INC.



David Bright  
Manager of Environmental Compliance

NOTICE TO RESPONSIBLE PARTY UNDER THE COMPREHENSIVE ENVIRONMENTAL RESPONSE,  
COMPENSATION AND LIABILITY ACT OF 1980

AS AMENDED BY SARA, 1986

DATE OF ISSUANCE: <u>1-17-92</u>	NAME & TITLE OF NOTICE RECIPIENT: <u>KENT TAYLOR</u> <u>PLANT MGR.</u>
ADDRESSEE: <u>REICHHOLD CHEMICALS INC.</u> <u>400 DOREMUS AVE</u> <u>NEWARK, NJ</u>	NAME OF RESPONSIBLE PARTY: <u>REICHHOLD CHEMICALS INC</u>

The United States Environmental Protection Agency (EPA) hereby notifies you that you may be liable under the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. §9601 et seq., (CERCLA) for the release and/or threatened release of pollutants, contaminants and/or hazardous substances as defined by CERCLA.

The release and/or threatened release noticed herein, has occurred on

(Date) 1-10-92, is located at 400 DOREMUS AVE  
NEWARK, NEW JERSEY

and consists of (Description of Incident) FIRE / EXPLOSION  
INVOLVING CERCLA / SARA / CWA HAZARDOUS SUBSTANCES

The EPA hereby requests that by 1-22-92 you report to the EPA, Region II, at the address and telephone number indicated below, those removal activities, in conformance with 42 U.S.C. §9601(23), which you have performed and/or those removal activities which you plan to perform immediately, to prevent, correct, clean up, minimize or mitigate the above-described release and/or threatened release.

You are hereby notified that upon your failure to perform immediate and proper removal activities with regard to the above-described release and/or threatened release, EPA, pursuant to 42 U.S.C. §9604, may perform such removal activities, and EPA will hold you liable for all costs of removal and for damages for injury to, destruction of, or loss of natural resources, including the reasonable costs of assessing such injury, destruction, or loss, if you are determined to be a responsible party.

If you deny responsibility for the above-described release and/or threatened release, you are requested to immediately advise EPA at the address and telephone number indicated below of the specific basis for your denial of responsibility.

FOR THE REGIONAL ADMINISTRATOR EPA REGION II  NAME: <u>CHARLES F. FITZSIMMONS</u>  TITLE: <u>OSC</u>	EPA ADDRESS AND TELEPHONE NUMBER:  U.S. EPA, Region II Emergency Response Branch Woodbridge Avenue Edison, New Jersey 08837 <u>908 (201) 548-8730 (24-hour Hotline)</u> <u>908 (201) 321-6657 (Business Hours)</u>
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## INVENTORY BUILDING 31-2, 5TH FLOOR, NEWARK - DOREMUS

00006-00	BISPHENOL A	9,550
00054-00	HEXAMETHYLENETETRAMINE	9,400
00088-00	STYRENE MONOMER	10,000
00101-00	PARAFORMALDEHYDE	70,486
00113-00	PTBBA	450
00133-00	BENZOIC ACID	15,000
00168-00	TRIETHYAMINE	738
00171-00	PENTAERYTHRITOL	26,000
00195-00	TRIMET	7,760
00259-00	GLACIAL METHACRYLIC ACID	4,140
00272-00	DIETHALOMINE	8,435
00292-00	ETHYLHEXYL ACRYLATE	1,600
00365-00	DMCD	40,050
00390-00	GLACIAL ACRYLIC ACID	9,744
00398-00	BUTYL ACRYLATE	22,012
00418-00	PELARGONIC ACID	6,045
00470-00	TRIMELLITIC ANHYDRIDE	27,080
00489-00	SANTICIZER 9 (OPTSA)	116,061
00743-00	CHLDRENDIC ANHYDRIDE	26,000
00801-00	BENZOGUANAMINE	533
00931-00	T-BUTYL PERBENZOATE	419
01513-00	ISOPHTHALIC ACID	82,798
02631-00	MALEIC ANHYDRIDE	17,435
02641-00	PHTHALIC ANHYDRIDE	13,750
02675-00	MELAMINE	17,650
02689-00	HYDROXYPROPYL METHACRYLAT	458
02986-00	HYDROXYETHYL ACRYLATE	4,080
03094-00	DI-T-BUTYL PEROXIDE	920
03153-00	N-PROPYL ACETATE	15,000
03201-00	UREA	21,150
03285-00	VAZO 64	417
03380-00	PEG 3350	1,000
03401-00	NEVILLE C115	14,500
03410-00	ISOOCTYLTHIOGLYCOLATE	1,254
03430-00	BAKELITE CKM-2400	1,250
03455-00	UCAR CK-2500	1,850
03489-00	DICUMYL PEROXIDE	100
03583-00	BETAPRENE BC115	11,100

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616,215

**Reichhold Chemicals, Inc.**  
Coating Polymers & Resins Division  
400 Doremus Avenue  
Newark, NJ 07105

Copy to Alana Gray

**REICHHOLD**

TO DAVE BRIGHT FROM BOB NAUTELIS

DATE 1/22/92 TIME

FAX #.

NO. OF PAGES (including cover sheet) 4

ADDITIONAL MESSAGE:

Dave,  
Per your request, enclosed is the  
initial report sent to the agencies  
involved.

Thanks

Bob N.

REPORT FOR REICHOLD FIRE AT DOREMUS AVENUE, NEWARK, NEW JERSEY

National Response Center Case #102412  
NJDEPE Case #92-1-11-0147-00

SITE LOCATION: Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey  
(201)589-3709

TIME OF INCIDENT: 11:35p.m. on January 10, 1992

AGENCIES INVOLVED:

Newark Fire Department  
Newark Arson  
Newark Prosecutors Office  
Newark Hazmat Team  
NJDEPE  
EPA Region II  
Essex County Emergency Management  
OSHA  
U.S. Coast Guard

SITE DESCRIPTION:

The Newark site is a resin manufacturing plant for production of alkyd resins, acrylic modified alkyds and amino (urea-formaldehyde). The plant is located in an industrial area and is bordered by Sun Oil, Hoechst Celanese, Doremus Avenue and Newark Bay. The manufacturing building (building 31) is at the north end of the property close to the Hoechst Celanese property.

INCIDENT DESCRIPTION:

A fire/explosion occurred at buildings 31/32 which are separated by a fire wall. The fire occurred on the fifth floor of both buildings and appears to have started in building 31. The cause of the fire/explosion is unknown at this time. It is known that the manhole cover of the monomer addition tank (tank 125) which is located on the fifth floor was blown off and the fire was intense in this area. This tank contained Butyl Acrylate catalyzed with VAZO-64 (MSDS attached) at the time of the incident. It was initially reported and believed the n-butyl alcohol was involved. No connection has been made with n-butyl alcohol at this time. An update of the incident will be made when the cause is determined.

INJURIES:

Eight Reichhold personnel were injured. One with burns who is in critical condition. Several with cuts and abrasions, and two with smoke inhalation.

RELEASE INFORMATION:

The Butyl-Acrylate which was catalyzed was released inside the manufacturing building. The fire is assumed to have involved vapors from the release. It is not known at this time what may have released to the atmosphere. The roadway below, which is paved with asphalt is spotted with an extremely viscous, sticky resin.

A concern was conveyed during reports to the NRC and NJDEPE that water from fire fighting could possibly reach the Newark Bay. No release of any significance was noticed by plant personnel, the NJDEPE, or EPA personnel on site.

REMEDIAL ACTIVITY:

Initial activity involved getting assistance from American Industrial Marine Inc. to supply a Vacuum Truck to recover water from fire fighting. Approximately 20,000 gallons was recovered from low lying areas and sewer manholes, and will be disposed of as a solid waste by Chemical Waste Management.

The building has been inspected to see if any materials are leaking or if any materials would be reactive with water. No hazards have been found which could cause a further incident.

The next step is to clean the roadway. O'Brien & Gere has been hired to determine the appropriate method for cleaning the roadway. Currently, high pressure water, steam cleaning and physical methods are being evaluated.

The interior of the building will not be addressed until the cause of the incident has been investigated and the structural integrity of the roof of buildings 31 and 32 is confirmed. In the meantime, O'Brien & Gere is preparing plans for clean up activities.

**Reichhold Chemicals, Inc.**  
Coating Polymers & Resins Division  
400 Doremus Avenue  
Newark, NJ 07105

**REICHHOLD**

January 22, 1992

U.S.E.P.A. Region II  
2890 Woodbridge Avenue  
Building 209  
Edison, New Jersey 08837-3679

ATTENTION: Mr. C. Fitzsimmons

Dear Sir:


Enclosed you will find a report about the Reichhold fire that occurred at the Doremus Avenue, Newark facility.

This report is meant to provide as much information as is available at the present time. The final report will be submitted as per regulatory requirements.

If you require additional information, please do not hesitate to contact me at the number listed below.

Very truly yours,

REICHHOLD CHEMICALS, INC.

  
Robert Naujalis  
Environmental Engineer

RN:cl

Encl:

**Reichhold Chemicals, Inc.**  
Corporate Headquarters  
PO Box 13332  
Research Triangle Park, NC 27709-3582

**REICHHOLD**

February 5, 1992

Bureau of Discharge Prevention  
New Jersey Department of Environmental Protection  
CN 027  
Trenton, New Jersey 08625-0027

ATTENTION: Plan Submittal

RE: Reichhold Chemicals, Inc. - Newark, New Jersey  
DPCC and DCR Plans - Financial Assurance Submittal

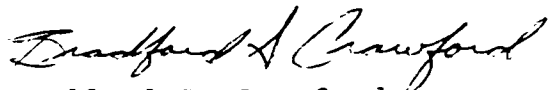
Dear Sir:

The Reichhold Chemicals, Inc. facility located on Doremus Avenue in Newark, New Jersey is required to submit a DPCC plan and a DCR plan by August 1, 1992 in accordance with N.J.A.C. 7:1E-4.6(b)2.

The facility experienced a release due to an explosion/fire on January 10, 1992. In order to comply with the confirmation report requirement in N.J.A.C. 7:1E-5.8(b)17., the enclosed insurance certificates are being submitted to demonstrate financial responsibility. The complete DPCC and DCR plans will be submitted consistent with N.J.A.C. 7:1E-4.6(b)2. at a later date.

If you have any questions concerning this submittal, please call me at (919) 990-7540.

Sincerely,



Bradford S. Crawford  
Regional Environmental Engineer  
Environmental Engineer

BSC/jwr

Enclosures

bcc: D. W. Bright - RTP  
K. Taylor - Newark  
D.E. Uyesato - RTP

# TEECHES INSURANCE LIMITED

---

Victoria Hall, Victoria Street  
P.O. Box HM 1826  
Hamilton HM HX, Bermuda  
Tel: (809)292-4402 Telex: 3276 Kero BA  
Fax: (809)292-1563

## CERTIFICATE OF INSURANCE

Name: Reichhold Chemicals Inc.

Address: 400 Doremus Avenue  
Newark, NJ 07105  
U.S.A.

Policy Number: 1-10001-03

Policy Period: March 31, 1991 to March 31, 1992

Insurer: Teeches Insurance Limited

Address: P. O. Box HM 1826  
Hamilton HM HX  
Bermuda

Insured: Reichhold Chemicals Inc.

Address: 800 Capitola Drive  
Durham, NC 27709  
U.S.A.

1. Teeches Insurance Ltd. the Insurer as identified above, hereby certifies that it has issued liability insurance covering the following facility: Reichhold Chemicals Inc., 400 Doremus Avenue, Newark NJ 07105 for taking corrective action caused by discharges arising from operating the facility identified above.

The limits of liability are Sudden and Accidental Pollution \$1,000,000 per occurrence and \$2,000,000 annual aggregate, exclusive of legal defense costs. This coverage provided under Policy No. 1-10001-03. The effective date of said policy is March 31, 1991.

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2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
- a. Bankruptcy or insolvency of the insured shall not relieve the Insurer or its obligations under the policy to which this certificate applies.
  - b. The Insurer is liable for the payment of amounts within any deductible applicable to the policy to the provider of corrective action, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms.
  - c. Whenever requested by the Department, the Insurer agrees to furnish to the Department a signed duplicate original of the policy and all endorsements.
  - d. Cancellation or any other termination of the insurance by the Insurer will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the insured or 60 days after a copy of such written notice is received by the insured or 60 days after a copy of such written notice is received by the Department whichever is later.
  - e. The insurance covers claims for any occurrence that commenced during the term of the policy that is discovered and reported to the Insurer within six months of the effective date of the cancellation or other termination of the policy.

I hereby certify that the wording of this instrument is identical to the wording in Appendix B of N.I.A.C. 7:1E and that the Insurer is licensed to transact the business of insurance in the State.

IN WITNESS WHEREOF, TEECHES INSURANCE LIMITED has caused this Certificate to be signed by an authorized officer at Hamilton, Bermuda.

Date

*Tammy* 24/1/92

*Vincent A. Ab*  
Teeches Insurance Limited

# TEECHES INSURANCE LIMITED

---

Victoria Hall, Victoria Street  
P.O. Box HM 1826  
Hamilton HM HX, Bermuda  
Tel: (809)292-4402 Telex: 3276 Kero BA  
Fax: (809)292-1563

## ENDORSEMENT NO. 4

Effective Date: February 1, 1992

Name: Reichhold Chemicals Inc.

Address: 400 Doremus Avenue  
Newark, NJ 07105  
U.S.A.

Policy Number: 1-10001-03

Policy Period: March 31, 1991 to March 31, 1992

Insurer: Teeches Insurance Limited

Address: P. O. Box HM 1826  
Hamilton HM HX  
Bermuda

Insured: Reichhold Chemicals Inc.

Address: 800 Capitola Drive  
Durham, NC 27709  
U.S.A.

1. This endorsement certifies that the policy to which the endorsement is attached provides liability insurance covering the following facility: Reichhold Chemicals Inc., 400 Doremus Avenue, Newark, NJ 07105, U.S.A. for taking corrective action caused by discharges.

The limits of liability are Sudden and Accidental Pollution \$1,000,000 per occurrence and \$2,000,000 annual aggregate, exclusive of legal defense costs. This coverage provided under Policy No. 1-10001-03. The effective date of said policy is March 31, 1991.

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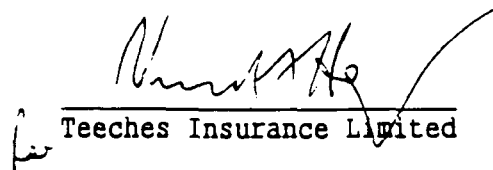
2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy provided, however, that any provisions inconsistent with subsections (a) through (e) of this Paragraph 2 and hereby amended to conform with subsections (a) through (e):
- a. Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.
  - b. The Insurer is liable for the payment of amounts within any deductible applicable to the policy to the provider of corrective action, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms.
  - c. Whenever requested by the Department, Teeches Insurance Limited agrees to furnish to the Department a signed duplicate original of the policy and all endorsements.
  - d. Cancellation or any other termination of the insurance by the Insurer will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the insured or 60 days after a copy of such written notice is received by the insured or 60 days after a copy of such written notice is received by the Department whichever is later.
  - e. The insurance covers claims for any occurrence that commenced during the term of the policy that is discovered and reported to the Insurer within six months of the effective date of the cancellation or termination of the policy.

I hereby certify that the wording of this instrument is identical to the wording in Appendix B of N.I.A.C. 7:1E and that the Insurer is licensed to transact the business of insurance in New Jersey.

IN WITNESS WHEREOF, TEECHES INSURANCE LIMITED has caused this endorsement to be signed by an authorized officer at Hamilton, Bermuda.

Date

January 24, 1992

  
for Teeches Insurance Limited

001239/BES/2

842899678

# REICHHOLD

## Supervisor's Report of Accident

1. Plant Mailing Address <b>400 Doremus AV</b> <b>NEWARK, NJ</b>		2. Plant Code/Location if different from Mailing Address		3. Dept. Code		4. Report Date <b>1/14/92</b>	
Employee Involved	5. Name of Injured/Address <b>Reginald Holloway</b>				6. Social Security No.		7. Clock No.
	8. Regular Job Title/Dupl. <b>WITAREHOUSEMAN</b>				9. Job Assignment at Time of Accident <b>CHANGING SHIFT</b>		10. Hours Worked in Previous 24 Hours
Place/Time of Accident	12. Length of Surv. (mo./yrs.) with Co. Present Job				13. Last Date Given Safety Talk or Attended Safety Meeting		11. Age
	16. Day of Work <b>Friday</b>				Month <b>JANUARY</b>	Day <b>10</b>	Year <b>1992</b>
	17. Place of Accident (exact place in department, plant or elsewhere) <input checked="" type="checkbox"/> On <input type="checkbox"/> Off Premises				18. Foreman		15. Sex <b>M</b>
				19. Supervisor <b>EDWARD ZGLOBICKI</b>		Hour AM (PM) <b>11:30</b>	
OSHA	20. <input type="checkbox"/> Fatality <input checked="" type="checkbox"/> Medical Treatment <input type="checkbox"/> Lost Work Day <input type="checkbox"/> Temp. Transfer, Restricted, etc. <input type="checkbox"/> First Aid						
	21. Death Date		22. Days Away from work <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		23. Days Restricted Activity <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		24. <input type="checkbox"/> Employee Transfer <input type="checkbox"/> Termination
Report Timing	25. If the date of this report and time of accident are not within 24 hours, why was this report delayed? <b>Treated at Hospital</b>						
Injury or Illness	26. Nature of Injury or Illness <b>SMOKE Inhalation</b>				27. Part of Body <b>Respiratory System</b>		
	27A. Name and Address of Physician <b>ST JAMES Hospital</b> <b>NEWARK, NJ</b>				27B. If hospitalized, name and address of hospital		
Physician/Hospital providing care							
How It Occurred	28. Description of accident/exclude what employee was doing and any machines, tools, structures, facilities or conditions involved. <b>Under investigation AT THIS TIME</b>						
What Were The Causes	29. What unsafe acts of the injured or other employee were responsible for this accident? <b>Under investigation AT THIS TIME</b>						
	30. What unsafe conditions were responsible for this accident?						
The Reasons Causes Existed	31. Why were the above unsafe acts committed or why did the above unsafe conditions exist?						
Remedy	32. What should be done to prevent a similar accident?						
	33. What action has been taken since accident?						
Safety Coordinator's Report	34. Reviewed and action taken as noted above or as follows:						
Signatures	35. Department Supervisor <b>Edward Zglobicki</b>				Date <b>1-14-92</b>		Plant Safety Coordinator
	37. Plant Manager				Date		

842899679

# REICHHOLD

## Supervisor's Report of Accident

1. Mailing Address 400 DCKENUS AVE NEWARK N.J.		2. Plant Code/Location if different from Mailing Address		3. Dept. Code		4. Report Date 1-14-92	
Employee Involved	5. Name of Injured/Address Ed Zglobicki			6. Social Security No. 137-26-0938		7. Clock No.	
	8. Regular Job Title/Dupl. SUPERVISOR			9. Job Assignment at Time of Accident		10. Hours Worked in Previous 24 Hours 8	
Place/Time of Accident	12. Length of Serv. (mo./yrs.) with Co. Present Job			13. Last Date Given Safety Talk or Attended Safety Meeting		14. No. Accidents Last 2 Years	
	16. Day of Week FRIDAY			Month 1	Day 10	Year 1992	Hour AM PM 11 30
	17. Place of Accident (exact place in department, plant or elsewhere) CONTROL ROOM			18. Foreman			
	19. Supervisor EDWARD ZGLOBICKI			15. Sex M			
OSHA	20. <input type="checkbox"/> Fatality <input type="checkbox"/> Medical Treatment <input type="checkbox"/> Lost Work Day <input type="checkbox"/> Temp. Transfer, Restricted, etc. <input type="checkbox"/> First Aid						
	21. Death Date		22. Days Away from work EO AD		23. Days Restricted Activity EO AD		24. <input type="checkbox"/> Employee Transfer <input type="checkbox"/> Termination
Report Timing	25. If the date of this report and time of accident are not within 24 hours, why was this report delayed? BEING TREATED AT HOSPITAL. IT WAS THE WEEKEND						
Injury or Illness	26. Nature of Injury or Illness			27. Part of Body			
Physician/Hospital Providing Care	27A. Name and Address of Physician			27B. If hospitalized, name and address of hospital BETH ISRAEL HOSPITAL			
How It Occurred	28. Description of accident/include what employee was doing and any machines, tools, structures, facilities or conditions involved. IN CONTROL ROOM AT TIME OF EXPLOSION						
What Were The Causes	29. What unsafe acts of the injured or other employee were responsible for this accident? INCIDENT UNDER INVESTIGATION AT THIS TIME						
	30. What unsafe conditions were responsible for this accident?						
The Reasons Causes Existed	31. Why were the above unsafe acts committed or why did the above unsafe conditions exist?						
Remedy	32. What should be done to prevent a similar accident?						
	33. What action has been taken since accident?						
Safety Coordinator's Report	34. Reviewed and action taken as noted above or as follows:						
Signatures	35. Department Supervisor Edward Zglobicki			Date 1-14-92		Plant Safety Coordinator	
	37. Plant Manager			Date		Date	

842899680

**REICHHOLD****Supervisor's Report  
of Accident**

1. Mailing Address <b>400 DORRINS AV</b>		2. Plant Code/Location if different from Mailing Address		3. Dept. Code		4. Report Date <b>1/14/92</b>	
<b>Newark, NJ</b>							
Employee Involved	5. Name of Injured/Address <b>John Banasiak.</b>				6. Social Security No.		7. Clock No.
	8. Regular Job Title/Dupl. <b>WAREHOUSEMAN</b>				9. Job Assignment at Time of Accident <b>LOADING T/WAGON</b>		10. Hours Worked in Previous 24 Hours <b>12 HRS</b>
Place/Time of Accident	12. Length of Serv. (mo./yrs.) with Co. Present Job		13. Last Date Given Safety Talk or Attended Safety Meeting		14. No. Accidents Last 2 Years		11. Age <b>59 YRS</b>
	15. Sex <b>M</b>		16. Day of Work <b>Friday</b>		Month <b>January</b>		Day <b>10</b>
	Year <b>1992</b>		Hour <b>11:30</b>		AM <b>PM</b>		
17. Place of Accident (exact place in department, plant or elsewhere) <input checked="" type="checkbox"/> On <input type="checkbox"/> Off Premises		18. Foreman <b>EDWARD Z-GLOBICKI</b>					
19. Supervisor							
OSHA	20. <input type="checkbox"/> Fatality <input checked="" type="checkbox"/> Medical Treatment <input type="checkbox"/> Lost Work Day <input type="checkbox"/> Temp. Transfer, Restricted, etc. <input type="checkbox"/> First Aid						
	21. Death Date		22. Days Away from work <input type="checkbox"/> <input type="checkbox"/> AD		23. Days Restricted Activity <input type="checkbox"/> <input type="checkbox"/> AD		24. <input type="checkbox"/> Employee Transfer <input type="checkbox"/> Termination
Report Timing	25. If the date of this report and time of accident are not within 24 hours, why was this report delayed? <b>BEING TREATED AT HOSPITAL, AND WAS ON WEEKEND,</b>						
Injury or Illness	26. Nature of Injury or Illness <b>SMOKE INHALATION</b>				27. Part of Body <b>Respiratory System</b>		
	27A. Name and Address of Physician <b>ST. JAMES Hospital</b>				27B. If hospitalized, name and address of hospital		
Physician/Hospital Providing Care	<b>Newark, NJ</b>						
How It Occurred	28. Description of accident/include what employee was doing and any machines, tools, structures, facilities or conditions involved. <b>UNDER INVESTIGATION AT THIS TIME.</b>						
What Were The Causes	29. What unsafe acts of the injured or other employee were responsible for this accident? <b>UNDER INVESTIGATION AT THIS TIME</b>						
	30. What unsafe conditions were responsible for this accident?						
The Reasons Causes Existed	31. Why were the above unsafe acts committed or why did the above unsafe conditions exist?						
Remedy	32. What should be done to prevent a similar accident?						
	33. What action has been taken since accident?						
Safety Coordinator's Report	34. Reviewed and action taken as noted above or as follows:						
Signatures	35. Department Supervisor <b>Edward Zglobicki</b>		Date <b>1-14-92</b>		Plant Safety Coordinator		Date
	37. Plant Manager		Date				

**REICHHOLD****Supervisor's Report  
of Accident**

Plant Mailing Address <b>400 DURENUS AVE.</b>		2. Plant Code/Location if different from Mailing Address		3. Dept. Code		4. Report Date <b>1-14-92</b>	
NEWARK N.J.							
Employee Involved	5. Name of Injured/Address <b>Kyle Butler</b>				6. Social Security No.		7. Clock No.
	8. Regular Job Title/Dupl. <b>OPERATOR</b>				9. Job Assignment at Time of Accident <b>OPERATIONS</b>		10. Hours Worked in Previous 24 Hours <b>8</b>
Place/Time of Accident	12. Length of Serv. (mo./yrs.) with Co. Present Job		13. Last Date Given Safety Talk or Attended Safety Meeting		14. No. Accidents Last 2 Years		15. Sex <b>M</b>
	16. Day of Week <b>FRIDAY</b>	Month <b>1</b>	Day <b>10</b>	Year <b>1992</b>	Hour AM PM <b>11 30</b>		
	17. Place of Accident (exact place in department, plant or elsewhere) <input checked="" type="checkbox"/> On <input type="checkbox"/> Off Premises <b>CONTROL ROOM</b>				18. Foreman		
					19. Supervisor <b>EDWARD ZGLOBICKI</b>		
OSHA	20. <input type="checkbox"/> Fatality <input type="checkbox"/> Medical Treatment <input type="checkbox"/> Lost Work Day <input type="checkbox"/> Temp. Transfer, Restricted, etc. <input type="checkbox"/> First Aid						
	21. Death Date	22. Days Away from work <input type="checkbox"/> ED <input type="checkbox"/> AD		23. Days Restricted Activity <input type="checkbox"/> ED <input type="checkbox"/> AD		24. <input type="checkbox"/> Employee Transfer <input type="checkbox"/> Termination	
Report Timing	25. If the date of this report and time of accident are not within 24 hours, why was this report delayed? <b>BEING TREATED AT HOSPITAL. IT WAS THE WEEKEND</b>						
Injury or Illness	26. Nature of Injury or Illness				27. Part of Body		
Physician/Hospital Providing Care	27A. Name and Address of Physician				27B. If hospitalized, name and address of hospital		
How It Occured	28. Description of accident/include what employee was doing and any machines, tools, structures, facilities or conditions involved. <b>OPERATOR IN CONTROL ROOM AT TIME OF EXPLOSION</b>						
What Were The Causes	29. What unsafe acts of the injured or other employee were responsible for this accident?						
	<b>INCIDENT IS UNDER INVESTIGATION AT THIS TIME</b>						
	30. What unsafe conditions were responsible for this accident?						
The Reasons Causes Existed	31. Why were the above unsafe acts committed or why did the above unsafe conditions exist?						
Remedy	32. What should be done to prevent a similar accident?						
Safety Coordinator's Report	33. What action has been taken since accident?						
Signatures	35. Department Supervisor <b>Edward Zglobicki</b>				Date <b>1-14-92</b>		Plant Safety Coordinator
	37. Plant Manager				Date		

## REICHHOLD

Supervisor's Report  
of Accident

1. Plant Mailing Address <b>400 DOREMUS AVE</b> <b>NEWARK NJ</b>		2. Plant Code/Location if different from Mailing Address		3. Dept. Code		4. Report Date <b>1-14-92</b>	
Employee Involved	5. Name of Injured/Address <b>Walter Regal</b>				6. Social Security No.		7. Clock No.
	8. Regular Job Title/Dupl. <b>OPERATOR</b>		9. Job Assignment at Time of Accident <b>OPERATIONS</b>		10. Hours Worked in Previous 24 Hours <b>8</b>		11. Age
Place/Time of Accident	12. Length of Serv. (mo./yrs.) with Co. Present Job		13. Last Date Given Safety Talk or Attended Safety Meeting		14. No. Accidents Last 2 Years		15. Sex <b>M</b>
	16. Day of Week <b>FRIDAY</b>	Month <b>1</b>	Day <b>10</b>	Year <b>92</b>	Hour AM/PM <b>11:35</b>		
	17. Place of Accident (exact place in department, plant or elsewhere) <input checked="" type="checkbox"/> On <input type="checkbox"/> Off Premises <b>CONTROL ROOM</b>				18. Foreman <b>1</b> 19. Supervisor <b>EDWARD ZGLOBICKY</b>		
OSHA	20. <input type="checkbox"/> Fatality <input type="checkbox"/> Medical Treatment <input type="checkbox"/> Lost Work Day <input type="checkbox"/> Temp. Transfer, Restricted, etc. <input type="checkbox"/> First Aid						
	21. Death Date	22. Days Away from work <input type="checkbox"/> <input checked="" type="checkbox"/> AD	23. Days Restricted Activity <input type="checkbox"/> <input checked="" type="checkbox"/> AD	24. <input type="checkbox"/> Employee Transfer <input type="checkbox"/> Termination			
Report Timing	25. If the date of this report and time of accident are not within 24 hours, why was this report delayed? <b>BEING TREATED AT HOSPITAL. IT WAS THE WEEKEND</b>						
Injury or Illness	26. Nature of Injury or Illness				27. Part of Body		
Physician/Hospital Providing Care	27A. Name and Address of Physician				27B. If hospitalized, name and address of hospital		
How It Occurred	28. Description of accident/include what employee was doing and any machines, tools, structures, facilities or conditions involved. <b>OPERATOR IN CONTROL ROOM AT TIME OF EXPLOSION</b>						
What Were The Causes	29. What unsafe acts of the injured or other employee were responsible for this accident? <b>INCIDENT IS UNDER INVESTIGATION AT THIS TIME</b>						
	30. What unsafe conditions were responsible for this accident?						
The Reasons Causes Existed	31. Why were the above unsafe acts committed or why did the above unsafe conditions exist?						
Remedy	32. What should be done to prevent a similar accident?						
	33. What action has been taken since accident?						
Safety Coordinator's Report	34. Reviewed and action taken as noted above or as follows:						
Signatures	35. Department Supervisor <b>Edward Zglobicky</b>		Date <b>1-14-92</b>		Plant Safety Coordinator		
	36. Plant Manager		Date				



**REICHHOLD****Supervisor's Report  
of Accident**

1. Plant Mailing Address <b>150 DOREMUS AVE</b>		2. Plant Code/Location if different from Mailing Address		3. Dept. Code		4. Report Date <b>1-14-92</b>	
NEWARK N.J.							
Employee Involved	5. Name of Injured/Address <b>Carlos Aranda</b>			6. Social Security No.		7. Clock No.	
Place/Time of Accident	8. Regular Job Title/Dept. <b>OPERATOR</b>		9. Job Assignment at Time of Accident <b>OPERATIONS</b>		10. Hours Worked in Previous 24 Hours <b>2</b>		11. Age <b>45</b>
	12. Length of Serv. (mo./yrs.) with Co. Present Job		13. Last Date Given Safety Talk or Attended Safety Meeting		14. No. Accidents Last 2 Years		15. Sex <b>M</b>
	16. Day of Week <b>FRIDAY</b>	Month <b>1</b>	Day <b>10</b>	Year <b>1992</b>	Hour AM PM <b>1130</b>		
	17. Place of Accident (exact place in department, plant or elsewhere) <input checked="" type="checkbox"/> On <input type="checkbox"/> Off Premises <b>CONTROL ROOM</b>			18. Foreman			
OSHA	20. <input type="checkbox"/> Fatality <input type="checkbox"/> Medical Treatment <input type="checkbox"/> Lost Work Day <input type="checkbox"/> Temp. Transfer, Restricted, etc. <input type="checkbox"/> First Aid						
	21. Death Date		22. Days Away from work <input type="checkbox"/> EO <input type="checkbox"/> AD		23. Days Restricted Activity <input type="checkbox"/> EO <input type="checkbox"/> AD		24. <input type="checkbox"/> Employee Transfer <input type="checkbox"/> Termination
Report Timing	25. If the date of this report and time of accident are not within 24 hours, why was this report delayed?						
	<b>BEING TREATED AT HOSPITAL + IT WAS THE WEEKEND</b>						
Injury or Illness	26. Nature of Injury or Illness			27. Part of Body			
Physician/Hospital Providing Care	27A. Name and Address of Physician <b>ST. JAMES HOSPITAL</b>			27B. If hospitalized, name and address of hospital			
How It Occurred	28. Description of accident/include what employee was doing and any machines, tools, structures, facilities or conditions involved. <b>OPERATOR IN CONTROL ROOM AT TIME OF BLAST INCIDENT IS UNDER INVESTIGATION AT THIS TIME</b>						
What Were The Causes	29. What unsafe acts of the injured or other employee were responsible for this accident? <b>INCIDENT IS UNDER INVESTIGATION AT THIS TIME</b>						
	30. What unsafe conditions were responsible for this accident?						
The Reasons Causes Existed	31. Why were the above unsafe acts committed or why did the above unsafe conditions exist?						
Remedy	32. What should be done to prevent a similar accident?						
	33. What action has been taken since accident?						
Safety Coordinator's Report	34. Reviewed and action taken as noted above or as follows:						
Signatures	35. Department Supervisor <b>Edward Zglobicki</b>			Date <b>1-14-92</b>		Plant Safety Coordinator	
	37. Plant Manager			Date			

**REICHHOLD****Supervisor's Report  
of Accident**

1. Plant Mailing Address <b>400 Doremus Ave Newark, NJ</b>		2. Plant Code/Location if different from Mailing Address		3. Dept. Code		4. Report Date <b>1-14-92</b>	
Employee Involved	5. Name of Injured/Address <b>Hentelais Amay</b>				6. Social Security No.		7. Clock No.
	8. Regular Job Title/Dept. <b>WAREHOUSEMAN</b>		9. Job Assignment at Time of Accident <b>Reporting To Work</b>		10. Hours Worked in Previous 24 Hours <b>8 Hrs</b>		11. Age <b>50 YRS</b>
Place/Time of Accident	12. Length of Serv. (mo./yrs.) with Co. <b>18 YRS</b>		13. Last Date Given Safety Talk or Attended Safety Meeting		14. No. Accidents Last 2 Years		15. Sex
	16. Day of Week <b>10</b>		Month <b>JANUARY</b>	Day <b>FRIDAY</b>	Year <b>1992</b>	Hour AM/PM <b>11:30</b>	
	17. Place of Accident (exact place in department, plant or elsewhere) <input type="checkbox"/> On <input type="checkbox"/> Off Premises <b>LOCKER ROOM</b>				18. Foreman <b>Edward Zglobicki</b>		
OSHA	20. <input type="checkbox"/> Fatality <input checked="" type="checkbox"/> Medical Treatment <input type="checkbox"/> Lost Work Day <input type="checkbox"/> Temp. Transfer, Restricted, etc. <input type="checkbox"/> First Aid <b>SMOKE INHALATION + RELEASED</b>						
	21. Death Date	22. Days Away from work <b>ED</b> <b>AD</b>		23. Days Restricted Activity <b>ED</b> <b>AD</b>		24. <input type="checkbox"/> Employee Transfer <input type="checkbox"/> Termination	
Report Timing	25. If the date of this report and time of accident are not within 24 hours, why was this report delayed? <b>EMPLOYEE WAS TREATED AT HOSPITAL / THIS WAS ON THE WEEKEND</b>						
Injury or Illness	26. Nature of Injury or Illness <b>SMOKE INHALATION</b>				27. Part of Body <b>Respiratory System</b>		
	27A. Name and Address of Physician				27B. If hospitalized, name and address of hospital <b>ST JAMES Hospital Newark, NJ</b>		
Physician/Hospital Providing Care							
How It Occurred	28. Description of accident/include what employee was doing and any machines, tools, structures, facilities or conditions involved. <b>under investigation</b>						
What Were The Causes	29. What unsafe acts of the injured or other employee were responsible for this accident?						
	30. What unsafe conditions were responsible for this accident? <b>THIS IS UNDER INVESTIGATION</b>						
The Reasons Causes Existed	31. Why were the above unsafe acts committed or why did the above unsafe conditions exist?						
Remedy	32. What should be done to prevent a similar accident?						
	33. What action has been taken since accident?						
Safety Coordinator's Report	34. Reviewed and action taken as noted above or as follows:						
Signatures	35. Department Supervisor <b>Edward Zglobicki</b>			Date <b>1-14-92</b>		Plant Safety Coordinator	
	37. Plant Manager			Date			

## REICHHOLD

Supervisor's Report  
of Accident

1. Plant Mailing Address <b>400 Loremes Newark NJ</b>		2. Plant Code/Location if different from Mailing Address		3. Dept. Code		4. Report Date <b>1/14/92</b>	
Employee Involved	5. Name of Injured/Address <b>William Flounoy</b>			6. Social Security No.		7. Clock No.	
	8. Regular Job Title/Dupl. <b>Pressman</b>			9. Job Assignment at Time of Accident		10. Hours Worked in Previous 24 Hours <b>12 Hr</b>	
Place/Time of Accident	12. Length of Serv. (mo./yrs.) with Co. Present Job			13. Last Date Given Safety Talk or Attended Safety Meeting		14. No. Accidents Last 2 Years	
	16. Day of Week <b>Friday</b>		Month <b>JANUARY</b>	Day <b>10th</b>	Year <b>1992</b>	Hour AM PM <b>11:30 PM</b>	
	17. Place of Accident (exact place in department, plant or elsewhere) <input type="checkbox"/> On <input type="checkbox"/> Off Premises <b>LUNCH ROOM</b>			18. Foreman			
OSHA	19. Supervisor <b>EDWARD ZGLOBICKI</b>						
	20. <input type="checkbox"/> Fatality <input checked="" type="checkbox"/> Medical Treatment <input type="checkbox"/> Lost Work Day <input type="checkbox"/> Temp. Transfer, Restricted, etc. <input type="checkbox"/> First Aid						
Report Timing	21. Death Date						
	22. Days Away from work <input type="checkbox"/> ED <input type="checkbox"/> AD						
Injury or Illness	23. Days Restricted Activity <input type="checkbox"/> ED <input type="checkbox"/> AD						
	24. <input type="checkbox"/> Employee Transfer <input type="checkbox"/> Termination						
Physician/Hospital Providing Care	25. If the date of this report and time of accident are not within 24 hours, why was this report delayed? <b>Treated at Hospital / weekend delay</b>						
How It Occurred	26. Nature of Injury or Illness						
	27. Part of Body						
What Were The Causes	27A. Name and Address of Physician						
	27B. If hospitalized, name and address of hospital						
The Reasons Causes Existed	28. Description of accident/include what employee was doing and any machines, tools, structures, facilities or conditions involved. <b>UNDER INVESTIGATION AT THIS TIME</b>						
Remedy	29. What unsafe acts of the injured or other employee were responsible for this accident? <b>UNDER INVESTIGATION AT THIS TIME</b>						
	30. What unsafe conditions were responsible for this accident?						
Safety Coordinator's Report	31. Why were the above unsafe acts committed or why did the above unsafe conditions exist?						
Signatures	32. What should be done to prevent a similar accident?						
	33. What action has been taken since accident?						
Signatures	34. Reviewed and action taken as noted above or as follows:						
Signatures	35. Department Supervisor <b>Edward Zglobicki</b>			Date <b>1-14-92</b>		Plant Safety Coordinator	
	37. Plant Manager			Date			

## REICHHOLD

Supervisor's Report  
of Accident

1. Plant Mailing Address <b>700 DOREMUS AVE</b>		2. Plant Code/Location if different from Mailing Address		3. Dept. Code		4. Report Date <b>1-14-92</b>	
NEWARK N.J.							
Employee Involved	5. Name of Injured/Address <b>Victorino Bernal</b>				6. Social Security No.		7. Clock No.
	8. Regular Job Title/Dept. <b>MAINTENANCE MECH.</b>				9. Job Assignment at Time of Accident		10. Hours Worked in Previous 24 Hours <b>8</b>
Place/Time of Accident	12. Length of Surv. (mo./yrs.) with Co. Present Job		13. Last Date Given Safety Talk or Attended Safety Meeting		14. No. Accidents Last 2 Years		11. Age
	16. Day of Week <b>FRIDAY</b>		Month <b>1</b>	Day <b>10</b>	Year <b>1992</b>	15. Sex <b>M</b>	
	17. Place of Accident (exact place in department, plant or elsewhere) <input checked="" type="checkbox"/> On <input type="checkbox"/> Off Premises				18. Foreman		
					19. Supervisor <b>EDWARD ZGLOBICKI</b>		
OSHA	20. <input type="checkbox"/> Fatality <input type="checkbox"/> Medical Treatment <input type="checkbox"/> Lost Work Day <input type="checkbox"/> Temp. Transfer, Restricted, etc. <input type="checkbox"/> First Aid						
	21. Death Date		22. Days Away from work ED <input type="checkbox"/> AD <input type="checkbox"/>		23. Days Restricted Activity ED <input type="checkbox"/> AD <input type="checkbox"/>		24. <input type="checkbox"/> Employee Transfer <input type="checkbox"/> Termination
Report Timing	25. If the date of this report and time of accident are not within 24 hours, why was this report delayed?						
	<b>BEING TREATED AT HOSPITAL. IT WAS THE WEEKEND</b>						
Injury or Illness	26. Nature of Injury or Illness				27. Part of Body		
Physician/Hospital Providing Care	27A. Name and Address of Physician				27B. If hospitalized, name and address of hospital		
How It Occurred	28. Description of accident/include what employee was doing and any machines, tools, structures, facilities or conditions involved.						
	<b>EXPLOSION</b>						
What Were The Causes	29. What unsafe acts of the injured or other employee were responsible for this accident?						
	<b>EXPLOSIONAL INCIDENT UNDER INVESTIGATION AT THIS TIME</b>						
The Reasons Causes Existed	30. What unsafe conditions were responsible for this accident?						
Remedy	31. Why were the above unsafe acts committed or why did the above unsafe conditions exist?						
Safety Coordinator's Report	32. What should be done to prevent a similar accident?						
	33. What action has been taken since accident?						
Signatures	34. Reviewed and action taken as noted above or as follows:						
Signatures	35. Department Supervisor <b>Edward Zglobicki</b>		Date <b>1-14-92</b>		Plant Safety Coordinator		Date
	37. Plant Manager		Date				

**REICHHOLD****Supervisor's Report  
of Accident**

1. Plant Mailing Address <b>400 DOKENIS AVE</b> <b>NEWARK N.J.</b>		2. Plant Code/Location if different from Mailing Address		3. Dept. Code		4. Report Date <b>1-14-92</b>	
Employee Involved	5. Name of Injured/Address <b>Thomas Johnson</b>			6. Social Security No.		7. Clock No.	
	8. Regular Job Title/Dept. <b>OPERATOR</b>			9. Job Assignment at Time of Accident <b>REPORTING TO WORK</b>		10. Hours Worked in Previous 24 Hours <b>5</b>	
Place/Time of Accident	12. Length of Serv. (mo./yrs.) with Co. Present Job		13. Last Date Given Safety Talk or Attended Safety Meeting		14. No. Accidents Last 2 Years		15. Sex <b>M</b>
	16. Day of Week <b>FRIDAY</b>	Month <b>1</b>	Day <b>10</b>	Year <b>1992</b>	Hour AM PM <b>11 34</b>		
	17. Place of Accident (exact place in department, plant or elsewhere) <input checked="" type="checkbox"/> On <input type="checkbox"/> Off Premises			18. Foreman <b>EDWARD ZGLOBICKI</b>			
OSHA	20. <input type="checkbox"/> Fatality <input type="checkbox"/> Medical Treatment <input type="checkbox"/> Lost Work Day <input type="checkbox"/> Temp. Transfer, Restricted, etc. <input type="checkbox"/> First Aid						
	21. Death Date		22. Days Away from work <input type="checkbox"/> ED <input type="checkbox"/> AD		23. Days Restricted Activity <input type="checkbox"/> ED <input type="checkbox"/> AD		24. <input type="checkbox"/> Employee Transfer <input type="checkbox"/> Termination
Report Timing	25. If the date of this report and time of accident are not within 24 hours, why was this report delayed? <b>BEING TREATED AT HOSPITAL. IT WAS THE WEEKEND</b>						
Injury or Illness	26. Nature of Injury or Illness			27. Part of Body			
Physician/Hospital Providing Care	27A. Name and Address of Physician			27B. If hospitalized, name and address of hospital			
How It Occurred	28. Description of accident/include what employee was doing and any machines, tools, structures, facilities or conditions involved. <b>EXPLOSION</b>						
What Were The Causes	29. What unsafe acts of the injured or other employee were responsible for this accident?						
	30. What unsafe conditions were responsible for this accident?						
The Reasons Causes Existed	31. Why were the above unsafe acts committed or why did the above unsafe conditions exist?						
Remedy	32. What should be done to prevent a similar accident?						
	33. What action has been taken since accident?						
Safety Coordinator's Report	34. Reviewed and action taken as noted above or as follows:						
Signatures	35. Department Supervisor <b>Edward Zglobicki</b>			Date <b>1-14-92</b>		Plant Safety Coordinator	
	37. Plant Manager			Date		Date	

Control Room - R5 4:00 - 12:00  
was going to charge some mat.

saw - flash heard ~~the~~  
boom felt glass knocked  
to panel board - event out  
back door - guard house

was in room 1:00 told only  
resin involved.

flash burn on face - cuts

1-12-92 Newark

- |     | Area                   | Need                                                                                                                                                                                                                                                                                                                                                     |
|-----|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.  | Env.                   | - Contain/clean - Examine Interior - Asbestos (Use level B suits/respirators HEPA). D.BRIGHT                                                                                                                                                                                                                                                             |
| 2.  | EPA                    | - Write incident report (preliminary report)                                                                                                                                                                                                                                                                                                             |
| 3.  | DEP                    | - Write incident report (preliminary report)                                                                                                                                                                                                                                                                                                             |
| 4.  | Engineering contractor | to start prep. on bid packages for cleanup of resins. Set up for bids.                                                                                                                                                                                                                                                                                   |
| 5.  | Facility safety        | - debris - pipe bridge/windows / toxic vapors atmosphere / explosion proof lights not fully integrated / drums - pressurized? / IH monitoring / do we kill elec. to facility. What is in Tk-119? Sample 119 & 125. O'Brian & Gere to do determination as to level A/B/C - IH MONITORING & ENVIRONMENTAL STATUS-hired by our attorney (Bill Ellis).       |
| 6.  | OHSA                   | - Homework list from Bill Ellis. Alsaaine to come in. Outside LOCAL concil familiar with OSHA.                                                                                                                                                                                                                                                           |
| 7.  | Fire Dept/Prosecutor   | - interview fire dept personnel & arson investigator.                                                                                                                                                                                                                                                                                                    |
| 8.  | Employees              | - continued support of effected personnel / Crawford to have special duty nurses on duty 1/13/92 / personnel updates of hospitalized personnel / actual status of Vick Bernalds - condition &/or medical status to be sought by arson investigator for RCI / contact plant clinic. Interview w/ hospital released personnel. HUMAN RESOURCES COUNSELING. |
|     |                        | Employee - policy for removal of personal items.                                                                                                                                                                                                                                                                                                         |
| 9.  | External responders    | - condition & number of effected fire fighting department.                                                                                                                                                                                                                                                                                               |
| 10. | Internal resources     | - Buffalo R&D lab for analysis of contents of Tk 119/125 & on exterior of tank. Kent Taylor/ Tom Sturm/ Art Dieffenbach.                                                                                                                                                                                                                                 |
| 11. | Media                  | - current/future - Steve Rieback.                                                                                                                                                                                                                                                                                                                        |

12. Corp. Comm. - internal announcement written by Rick French. Customer service advisory as to distribution of shipments, etc.
13. MFG. - permission to repipe to avoid area - storage tanks to be emptied & mat'l. shipped to Albert. Empty tanks in bldg. 32. Work w/ raw materials - finished products. Plans & releases required.
14. Mrs. Bernal - notify her employer to fact that she will be unable to report to work Monday.
15. Emp. interviews - statements - use Elaine Grey. Formalize statements & have them sign off.
16. Meada - statement given by Nick Prato.
17. Security - all gates chained & locked (RXR gate).
18. Peroxide room - inventory of room at time of fire.
19. Thank you letters - Newark Fire Dept/Police/Mick & Albert Ave. employees/Newark employees - Rick French.
20. Investigation - samples & structural integrity of bldg. Continuous monitoring capability.



R-4 jelled - possible solvent.  
R-5 - cooled resin.

PRIORITY FOR 1/12.

1. EPA/DEP REPORT - D. BRIGHT
2. INVENTORY TANKS
3. OSHA - pressure vessel failure. REVIEW HAZCOM, EMERGENCY  
RESPONSE, ETC.
4. VICK BERNAL
5. EMPLOYEE PERSONAL ITEMS.
6. Samples 119/125/floor resins.
7. Bldg. status
8. Security

\*\* IH SURVEY AT 1:00.

Mick Gasparik statement 1/12/92 - 9:51 a.m.

Information.

Arrived at 10 'til 12.

Guard (Tony Parideso) called Mick. Mick called guard & then supervisor in plant. Talked to Steve and then Ed Zblecki. Mick was informed fire dept. on the way. No communications with fire chief prior to Mick's arrival. Sandy Patel called for chemical expertise. Mick spoke w/ Bob Swale. Coast Guard called Jimmy Eftaxes. Coast guard to bring in boat to shoot water onto tank farm. Information given to CG as to no poisons/TDI/etc. on site.

Fire chief given info as to internal staircases. Hoses & crews go floor to floor. Fire in sampling room & storage areas on 5th floor (bldg 32). FC given information as to location of peroxides (VAZO 64). Fire in bldg. 32 next to peroxide room. Mick climbed fire track ladder to look into Bldg 31. No fires on at this time in 31. Time around 1:30 - 2:00 a.m. Fire dept. was in bldg. 32 putting out fire.

Guard shack - person on table (Vick Bernal) - skin on face charred - no sign of resin. Hair burned off. Neck burned - covered w/ blanket & raincoat to the neck.

? from Bill Ellis - is there a problem w/ drinking-drugs currently? Per Mick - no!

Possible stash of alcohol? I don't know.

If something bad is happening in 125 & pops manhole, could it make banging noises? I don't know.

Ray Mater 1-13-92 - called back in: 5<sup>00</sup> PM.  
 by: Bill E: "Probably when you leave here - things will come back"

Ray: They did:

(1) a calls - time factor

800-221-3222 (2) why  
 • dialed operator; then a 6-3-22-22 Fire Dept.  
 • Wells Fargo - looked at - control panel, know -  
 • Alarm was already sounded - but he didn't double  
 • Done quick - Called Fred. sure

(3) • Ray - had worked gloves on - does not know  
 how he felt.  
 guided him - , did not have to pick

Vapor - dense cloud

Reconstructed:

- 1) Ray remembers all of the phone calls going very quickly.  
 - He called the operator first and asked for the fire dept.
- 2) - After reporting the fire (explosion??) - then he called Wells Fargo - just to make sure that they got the alarm, (on a fire on the roof - no sprinklers went off + no alarm sounded - so he wanted to make sure this time.  
 - Then he called Fred.
- 3) - Ray had work gloves on - does not remember how Vic felt; Ray lost the work gloves in the pandemonium

% Mr. Caldwell  
To: Bill Ellis

842899695

Carlos

Reggie

Amay

Manual Peno

Reggie

✓ Loading tanks - 8:30 still loading tanks, 9:30 to 11:30 loading

②. tank wagon - talked to Fortman  
General went to ~~toilet~~ <sup>lunchroom</sup> - Gave sample to

Steve ~~Atto~~ Aluk at 11:25 & took elevator ~~door~~ down to 3rd.

Amay. Heard boom, pushed

things <sup>shook</sup> them against walls, was in lunch room about 1 minute.

only heard one. ran to tank farm & closed valves to stop pumping. went down fire door, Jones Flower, Joe Rath, Amay.

He had just come on <sup>←</sup> 4 May heard one boom outside  
Shift 11:05 Heard ~~Aluk~~ <sup>Aluk</sup> tell Vic about  
went up to lunchroom about 125 problem.

842899697

went to guard shack through the alley

Carlos - Operator

watching 3 & 4. tried to ungel 4 by adding butinal (7000.0) was to distill solvents. was going to get warehouse man to drum solvents.

discussed  
problem  
w/ Manny

Charged 3 (LT 124) - took sample at 11:00. Telling Kyle what was going on when explosion happened. Heard rumble & was hit by explosion. doesn't remember hearing anything. Saw fire in control room & went out through exit.

7:45 → He went up with Manny & looked at problem. Nitro gauge is over heard - 15 lbs of pressure did not retry. Just made sure it was done right.

Newark  
Police

admitted at ~~2:00~~ 1:30 to 2:00  
treatment St. James

Vic was conscious - NO treatment other than Heminghaus

Pressure <sup>gauge</sup> overhead → 15# — Pressure already  
on tank — went Manny Neto →  
7:45. — everything OK.  
vacuum not on → not too loud  
above tank — couldn't adjust.

---

Manny Neto → told somebody — said he  
put in 9 drums @ 50 lbs/drum

1/15/92 JMT  
Interview  
73

VASO - Reactor 3/4 →

- ① Reggie Holloway → 4:00-12:00 - loading truck wagons -  
didn't  
③ Carlos Aranda →  
② Max Smoga → just got there.  
~~Manuel Porto~~ →

none of them added VASO

Reggie Holloway → 3:30 P.M. → control room  
order - loading ~~truck~~ truck wagons  
finished around 8:00 -

Lunch, 8:30 → second truck <sup>to load</sup>  
wagon - measurements -  
different kind -

Plant to Press room - second floor  
<sup>now</sup> 9:30 → start loading - 11:30  
6000 gallons tank → 2 hours  
- about another 1/2 hour -  
go find someone to finish



JMB 1/15/92  
3/3

went through alley

---

Carlos ~~Aranda~~ - Operator

3:30 → returned Donald Griffin -  
chemical operator - #3 + #4

#4 - Gelled RF → added solvent  
butanol → PWT is 7000 #

Vacuum distill → Tank as 3rd floor  
Receiver

stopped → line open - solvent will go  
into → ~~next room~~ next shift  
would drain off.

R3 - Charge #124 - booster →

2 hours - Sample @ 11:00 -  
was going to get another sample  
Standing next to Kyle →

11:30 → No warning → saw  
fire - in front of R3 vents

Belknap - Manny Nito - went up and looked  
at it.

go to locker → normally from tank  
~~back~~ farm to truck →

Gave sample to Blocker at 11:25  
- elevator 4th floor to 3rd floor -  
- Big noise

walked to Lunch room → about  
1 minute

- Ran out to tank farm - closed  
valve - couldn't shut off -  
remote to press room

---

Room shook. - heard exp.

Mc Ami, Sam Jones, Flavinoy -  
down stairs

---

Amey heard second explosion - outside -  
big boom - maybe tank wagon?

3rd 11:05 clocked in

3rd floor → lunch room - changed clothes

Can't pump 119 - <sup>hear</sup> talk w Vic

Saw Kyle → 11:10 - 11:15 - left

lunch room → 11:25 Reggie comes in -

heard second bang by cooling tank -  
windows

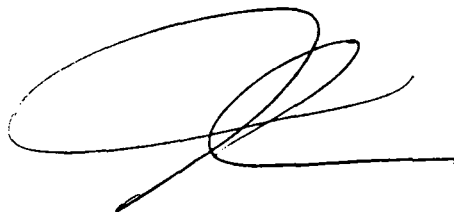
2/21/92

Material Removed from Newark Doremus Avenue Site

- R2 Lab Notebook H468-H723 (1/20/92) -- B/13
- Bolt fragment (5th floor stairwell, 31-5) (1/19/92) -- B/13
- Bolt fragment (alleyway between B/25 and B/31) (1/20/92) -- B/13
- Bolt fragments (T125 area near forklift, 31-5) (1/17/92) -- B/13
- Polymeric material sample, elbow T125 (1/17/92) -- sent to Dover Lab
- White crystal-like material, elbow T125 (1/17/92) -- sent to Dover Lab
- R2 Liquid sample (1/18/92) (date ?) -- sent to Pensacola Lab
- T119 samples (2 4-oz. jars) (date ?) -- disposition unknown
- Raw material QA information (test results) from 4th Fl lab (1/20/92) -- B/13
- Arolon 557 information from K. Taylor office (1/20/92) -- B/13
- Miscellaneous plant layout information from K. Taylor office (1/20/92) -- B/13
- Elbow from T125 (date ?) -- B/13
- Rupture disk assembly from T125 (date ?) -- B/13
- Transfer line valve, flanged (date?) -- examined, not disconnected -- left in B/31-5
- Vent valve assembly with chain wheel (date ?) -- B/13

Randy -

need to discuss prior to sending  
notebooks are bad news!



842899702

REICHHOLD CHEMICALS, INC — EMULSION POLYMERS DIVISION  
ANALYTICAL REPORT 92-092

SUBMITTER: Chang, J  
PROJECT #: 111-0003  
COPIES TO: Campbell, J Grossman, J Sadler, C  
ANALYST(S): Gunter, P. Truitt, P  
SAMPLE(S): T-119

DATE SUBMITTED: 01/24/92  
DATE COMPLETED: 01/29/92

BACKGROUND

This sample is from a holding tank at Neume Daremus that is believed to contain unreacted monomers. We need to know inhibitor levels in the sample in order determine how the sample will be handled henceforth. We also need to know the approximate monomer ratio to determine whether stratification has occurred. We believe the following monomers and monomer contents are present:

<u>MONOMER</u>	<u>APPROX. %</u>
Methyl methacrylate	33
Styrene	10
Hydroxy ethylacrylate	7
Acrylic acid	10
* N Butyl acrylate	40

\* Sample may not contain N Butyl acrylate.

WORK REQUESTED

1. Monomers
2. Monomer content
3. Inhibitor content

RESULTS

POLYMER CONTENT:

None detected.

Method used: Rohm & Haas method "Determination of traces of polymer in monomer" using methanol as a solvent.

INHIBITOR CONTENT:

120 PPM. MEHQ

842899703

Method used: Rohm & Haas method where MEHQ reacts with nitrous acid to form a nitroso derivative, a yellow compound measured at 420 nm.

Note: The tertiary butyl catechol in styrene (amounts to 2.5 ppm in this mixture) was not successfully separated and is not included with the MEHQ content.

#### MONOMERS AND MONOMER CONTENT:

Methods used: GC, FTIR, and Titrations.

Monomer and monomer contents are listed as follows:

<u>monomer</u>	<u>%</u>
Methyl methacrylate	51
Styrene	17
Hydroxy ethylacrylate	12
Acrylic acid	20
N-Butylacrylate	nd

Limits of detection for BA = 1%

NOTE: The sample was slightly off color (yellow) when received and turned black within three days. The change in color was caused by the acrylic acid reacting with the tin container used for shipment. I will add approximately 10,000 ppm MEHQ to the sample and transfer the sample to a plastic container for proper disposal.

CONCLUSION: Butyl acrylate has not entered the premix tank T119. The monomers do not appear to have stratified. No polymerization has occurred and the inhibitor level is approximately in specifications.

— END OF THE REPORT —

**REICHOLD CHEMICALS  
COATING POLYMERS AND RESINS DIVISION**

Reichhold Chemicals  
4201 Genesee Street  
Box 210  
Buffalo, NY 14225

TEL:(716)826-2000  
FAX:(716)626-2013

**FAX TRANSMISSION**

DATE: 3-19-  
NO. OF PAGES (INCL COVER) 5  
COMPANY: RT R  
FAX NO: 919-998-7707  
ATTN: Alaine Gray  
FROM: Richard Foss

842899705

## SPENCER KELLOGG RESEARCH CENTER

0-251

## SPECIAL ANALYTICAL SERVICES REQUEST FORM

Date 1-16-92

Request Approved By \_\_\_\_\_

Submitted By NewarkProgram Number 0016

Date Required \_\_\_\_\_

Analytical Dept. \_\_\_\_\_

Est. Time Required \_\_\_\_\_

Est. Cost of Service \_\_\_\_\_

Identification of Samples: Information Supplied by Requisitioner  
(Number and Description)

residue from TK 125 1-13-92

residue from side of TK 124 1-13-92

Information Desired:

GPC data

IR identification

(Below this line for Analytical Department use only)

Conclusions Reached:

TK 125 - material is a polymerized butyl acrylate  
residue Polymer; no styrene present; no volatile  
material present. CEN structures present  
which is present in V230

residue from  
side of TK 124 - Same as above

	Mw	Mn	PD
TK 125 residue	89,243	2,610	
residue from TK 124	212,568	2,511	84.626

Total Time Spent 5 hrsCost of Service \$250.00

842899706

## SPENCER KELLOGG RESEARCH CENTER

0-251

## SPECIAL ANALYTICAL SERVICES REQUEST FORM

Date 1-17-92

Request Approved By \_\_\_\_\_

Submitted By Newark

Program Number \_\_\_\_\_

Date Required \_\_\_\_\_

Analytical Dept. \_\_\_\_\_

Est. Time Required \_\_\_\_\_

Est. Cost of Service \_\_\_\_\_

Identification of Samples: Information Supplied by Requisitioner  
(Number and Description)

- 1) Monomer tank 119
- 2) 1/16/92 JMB sample of clothing

Information Desired:

- 1) % composition monomer mix  
% inhibitor
- 2) what is clothing impregnated with?

(Below this line for Analytical Department use only)

Conclusions Reached:

- 1) Tank 119  
16.3% acrylic acid  
10.0% Hydroxyethyl acrylate  
55.7% methylmeth acrylate  
18.0% Styrene  
0% n-butyl acrylate  
inhibitor content being done @ Pensacol.  
ans. 1-21-92
- 2) Clothing - impregnated with polymerized n butyl acrylate; no free butyl acrylate monomer present

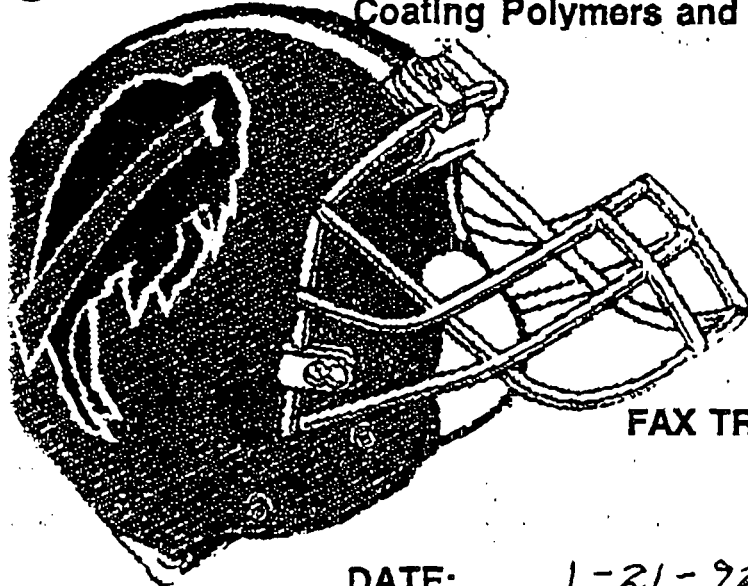
Total Time Spent 14 hrCost of Service \$750

842899707



JAN 21 '92

P.4

2:06 pm  
CS**Reichhold Chemicals  
Coating Polymers and Resins Division**

Reichhold Chemicals  
4201 Genesee Street  
Box 210  
Buffalo, NY 14225

TEL: (716) 626-2000  
FAX: (716) 626-2013

**FAX TRANSMISSION**

**DATE:** 1-21-92  
**NO. OF PAGES (INCL. COVER):** 1  
**TO:** Reichhold Newark Doremus  
**FAX NO.** 201-817-9173  
**ATTN:** Jim Chang ; Mike Bowers  
**FROM:** R. A. Foss

MEHQ Level in Tank 119  
is 122 ppm ; duplicate  
determination 123 ppm



ACTS TESTING LABS, INC.

25 Anderson Road  
Buffalo, NY 14225-4928  
Tel (716) 897-3300  
Fax (716) 897-0876

Technical Report 2-0250E  
P.O. # 2148

February 18, 1992  
Page 1 of 1

Mr. Richard Foss  
REICHHOLD CHEMICALS

SUBJECT:

Analyses of two (2) solid samples for Total Nitrogen. The samples were received on February 3, 1992.

RESULTS:

	<u>T125 SAMPLE</u>	<u>T125 ELBOW GEL SAMPLE</u>
Nitrogen, Total	7,380	1,560

Results are reported as micrograms per grams (ug/g) or ppm.

EXPERIMENTAL:

The Nitrogen analysis was conducted according to procedures listed in "Test Methods for the Examination of Solid Waste Physical/Chemical Methods", EPA SW-846.

ACTS TESTING LABS, INC.

*Charles E. Hartke*

Charles E. Hartke  
Manager, Chemistry Laboratory

/smd

ACTS TESTING LABS, INC.

*Lisa M. Clerici*

Lisa M. Clerici  
Analyst, Chemistry Laboratory

Buffalo, New York

Hong Kong

Lille, France

Our reports and letters are for the exclusive use of the client to whom/which they are addressed. Communication of ACTS Testing Labs, Inc. reports and letters to any others and/or use of the name of ACTS Testing Labs, Inc. requires our prior written approval. Our letters and reports are limited solely (i) to standards and procedures identified in them and (ii) to the sample(s) tested. Test results are not necessarily indicative nor representative (i) of the quality of the lot from which the sample was taken or (ii) of apparently similar or identical products. Unless otherwise stated, it is the responsibility of the client to insure the representativeness of the samples submitted to ACTS Testing Labs, Inc. for testing.

842899709

**REICHHOLD CHEMICALS, INC.**

**LEGAL DEPARTMENT**

**FACSIMILE TRANSMISSION**

DATE: February 24, 1992  
TO: Bill Ellis  
LOCATION: Forensic Engineering  
FAX NUMBER: 404-984-2257  
TELEPHONE NUMBER: 404-952-4764  
FROM: Alane E. Gray  
TELEPHONE NUMBER: 919-990-7864  
  
COMMENTS: Sample results from Pensacola.  
Alane

**NUMBER OF PAGES (INCLUDING COVER SHEET):**

**2**

From Facsimile Number: (919) 990-7707

842899710

interoffice communication

842899711

## TRANSMISSION CONFIRMATION REPORT No.=000151

DATE/TIME	FEB 2, 1989 3:39PM
DURATION	1m 16s
TRANSMITTER	OMNIFAX 0 1 2 3 4 5 6 7 8 9
RECEIVER	----- 919 990 7707
PAGES XMITTED	03
PAGES ERRORED	
RESULT	OK
COMM. MODE	G3
RESOLUTION	NORMAL

1005502271

842899712

To: Eileen Fayle

From: Alane Gray

3 pages

Please fax the attached  
to Mike Zahm at the  
Buffalo Pilot Plant 1st  
thing in the morning.

Sample labeled 1/16/92 JMB -  
Samples of Clothing

Samples appear to be impregnated with some material.

Can we identify it. It is probably either N-butyl acrylate monomer or a polymerized version of the same.

Sample labeled: Monomer Mixture 1/16/92 J. Chang  
Task 119, M. Bowers

We need to know the monomers present and the inhibitor levels.

We think we have the following things present.

Methyl methacrylate

styrene

hydroxy ethyl acrylate

glacial acrylic acid

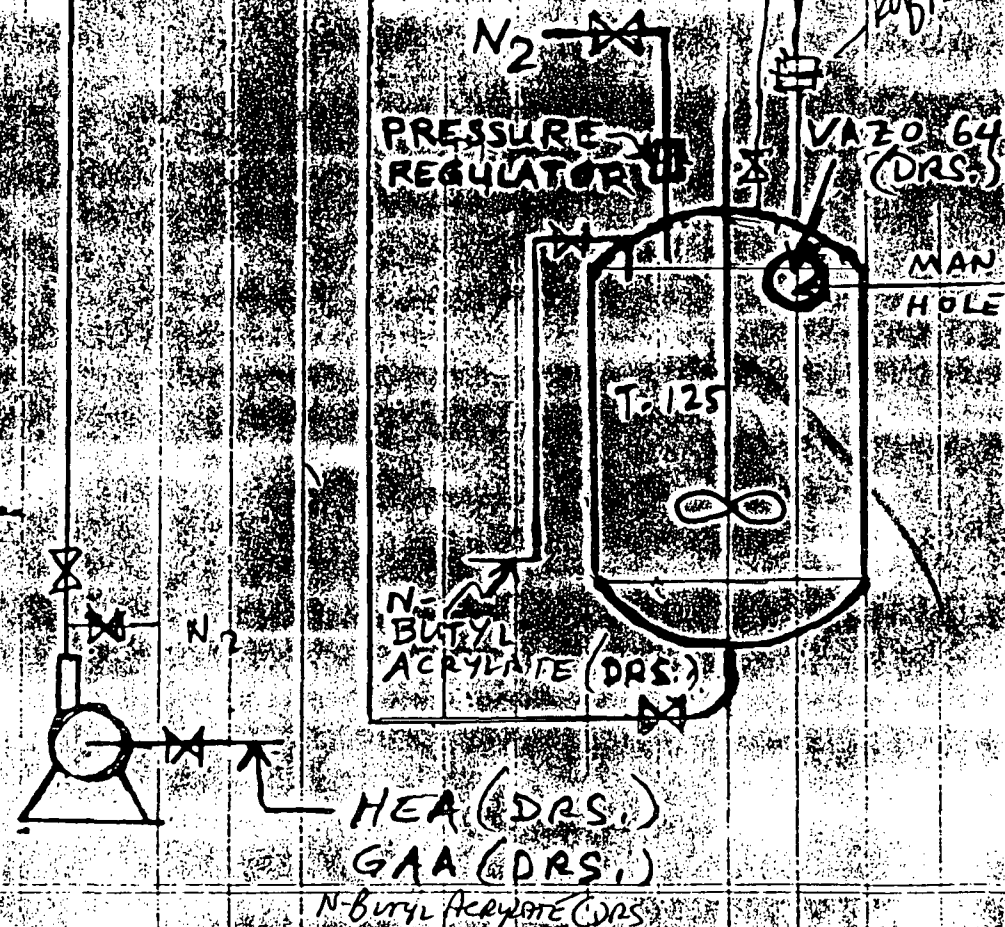
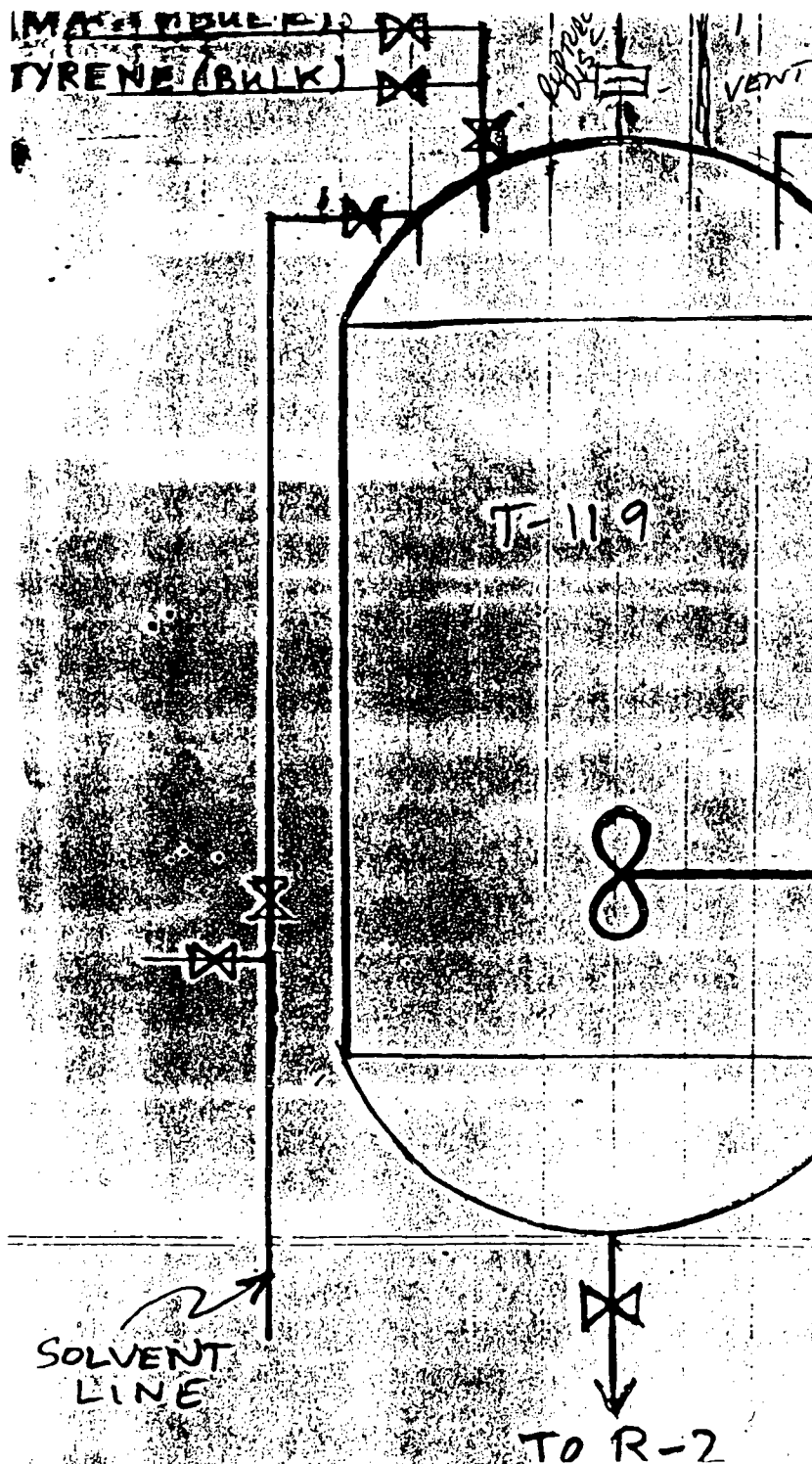
N-butyl acrylate

Mixture is ~~possibly~~ possibly partially polymerized. We would like to know extent of polymerization, if any.

Call Jimmy Chang 201-589-3709

He is waiting for the results  
so he can determine disposition  
of tank contents and potential  
hazards. Please let him  
know ASAP.





842899716

## Additional Samples

- 1) Liquid from Bottom T125  
(Interior of tank) - sent to  
Buffalo Lab (Reichhold Lab)
- 2) Scrape from T124 (exterior of tank -  
directly below vent lines) - sent  
to Buffalo Lab (Reichhold Lab)

Alane Gray:

As per Mike Bowers request, this material has been sent to your attention

Mike:

Gel Permeation Chromatography separates a polymer by molecular size; the larger molecules eluting first, the smaller molecules eluting last. Therefore, the whole chromatogram is a molecular size distribution. To get a molecular weight distribution the column is calibrated using known narrow molecular weight polystyrene standards. The elution times are plotted against the molecular weights of the polystyrene to produce a calibration curve. The computer then uses this calibration curve to produce a elution time at molecular weight of the polymer.

number average molecular weight

$$\bar{M}_n = \frac{\sum N_i M_i}{\sum N_i} \quad \text{or} \quad \frac{W}{\sum \frac{w_i}{M_i}}$$

i.e. the number of molecules  $\times$  the molecular weight of that molecule divided by the total number of molecules  
 or the total weight  $W$  divided by the number of moles of each molecular weight

$$\bar{M}_w \text{ weight average} = \frac{\sum N_i M_i^2}{\sum N_i M_i}$$

FAX

REICHHOLD  
CHEMICALS

Newark, Albert Avenue

TO: *Alane Gray*

FAX No.

FROM: *Gail Mc Morrow*

FAX No. 201-589-2898

*Per our telephone conversation.  
Thanks -*

FROM: OMNIFAX

TO:

9195446896

JAN 30, 1992 5:03PM P.02

TO: Ann Marie Hansen

FROM: G. McMorrow

cc: Kent Taylor

LOCATION: Newark-Doremus

DATE: January 29, 1992

RE: REIMBURSEMENT TO  
BERNAL FAMILY IN  
REGARDS TO INJURIES  
SUSTAINED BY  
VICTORINO BERNAL

Please arrange to issue checks to cover the following expenses incurred by the Bernal family in regards to the accident at the plant on January 10, 1992.

Mrs. Bernal travels to St. Barnabas Hospital in Livingston, N.J. from Jersey City twice each day. At the rate of 20 miles each direction, at a cost of \$0.22/mile, this would equal mileage expenses of \$470.40 for the period January 11, 1992 through January 31, 1992.

In addition, Mr. Bernal would normally receive a paycheck, based on a 40 hour work week, for 120 hours over the last three weeks. As his family receives a workmen's compensation check in the amount of \$337.52 per week, we are going to supplement the difference. This amounts to the following: 40 hours X 14.34/hr. = \$573.60 gross, \$480.61 net. Deducting the workmen's compensation payment, this results in a difference of \$93.09 per week. We will issue a check each week for this amount.

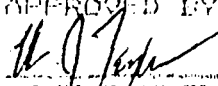
Mrs. Bernal has been unable to work since the accident occurred, and is currently on a personal leave of absence from her position at Book Dynamics, Inc., in Linden, NJ. Reichhold plans to cover her lost wages during this three week period also. As Mrs. Bernal would earn \$5.85/hr., based on a 40 hour work week, this would amount to \$234.00 a week, or \$702.00 gross for this period.


Mrs. Bernal's income, as well as the travel expenses, would not be taxed by us, however would be reported at the end of the year as earnings on a 1099. For this purpose, her Social Security number is 135-68-4472.

We plan on continuing this procedure until such time as Mr. Bernal is released from the hospital.

Thank you.

APPROVED BY:

  
KENT TAYLOR

  
TRENT RHYNE

842899720

**Reichhold Chemicals, Inc.**  
Coating Polymers & Resins Division  
400 Dorernus Avenue  
Newark, NJ 07105

**REICHHOLD**

January 31, 1992

Mrs. Herminia Bernal  
36 Roosevelt Avenue  
Jersey City, NJ 07304

TOTAL CHECKS \$1451.67

Dear Mrs. Bernal:

Enclosed you will find two checks which the company is issuing to you to assist you during your husband's hospitalization.

The first check, #97029, in the amount of \$279.27, is to supplement the worker's compensation checks. Vic would earn, based on a 40 hour work week at \$14.34/hr., a gross pay of \$573.60, resulting in a net of \$480.61. As the worker's compensation check is for \$387.52 per week, this results in a difference of \$93.09 per week. For weeks ending January 19th, 26th, and February 1, 1992, this results in a difference of \$279.27. In order to supplement this loss of net pay, and to satisfy tax deductions, we will issue a gross pay check for \$112.34 per week, which after taxes will be \$93.09.

The second check in the amount of \$1,172.40 covers two separate items. Included in this amount are travel expenses to the hospital, which we have calculated at 2 trips per day, for a total of 80 miles at \$0.28 per mile. This equates to \$470.40 for the period starting January 11 through January 31, 1992.

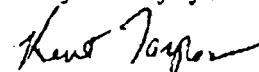
Also included in this check is the lost income you have sustained from January 11, 1992, up to and including January 31, 1992. According to the information we have received, you earn \$234.00 a week, and this figure multiplied by 3 weeks results in a gross pay loss of \$702.00.

We will need to report this income to the Internal Revenue Service as personal income. Since you are not an employee we cannot deduct Federal and State taxes, or F.I.C.A. You will need to include this income on your 1992 income tax return. In addition, the transportation expenses would also be reported as income. However, tax laws may allow you to deduct transportation costs as medical expenses.

It is sincerely hoped that this additional assistance will at least relieve some of the monetary concerns you and your family are experiencing. Vic is a valued employee of our organization, and we are hoping for a complete recovery.

If you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,



Kent Taylor  
Plant Manager

(201) 589-3709  
(201) 817-9173 (Facsimile)

842899721

REICHHOLD

interoffice communication

TO: A. Vickers

FROM: K. Taylor

cc: R. Naujelis  
N. Prato

LOCATION: Newark-Doremus

DATE: February 7, 1992

SUBJECT: BUILDING 4 CLEAN UP  
NEWARK-DOREMUS

*Handwritten:*  
Bundled  
PFT and file

We need to proceed on the clean up of the building 4 inside tank farm soon. The floor of the building has years of built up material. The last time anyone in the plant remembers the floor being cleaned is 1981.

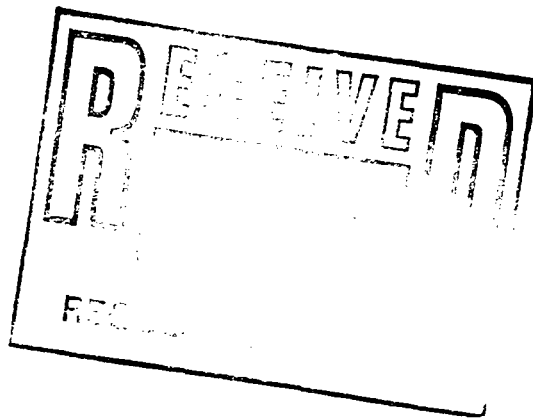
My primary concern is that we now only have the one building in operation for material transfer and should return its condition to clean. The other concern is for potential liability for any run off, perceived run off or spill, now that Textron has remediated the soil directly beneath the building.

The approximate cost of clean up is \$10,000 for labor and \$15,000 for material disposal.

We will plan to proceed on this within the month.

*Handwritten signature:* K. Taylor

KT/glm



842899722

C.E.A.R. REQUIRED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		C.E.A.R. NO.	REQUISITION DATE 1/28/92	REQ. NO. R 007507
REQUISITIONER R. NAUJEZ IS	RECEIVING POINT	VENDOR CODE	TAX % - WHEN EXEMPT SHOW NO. OR TAX AUTH.	
SHIP VIA	F.O.B. 1-DESTINATION 2-SHIP PT. 3-OTHER CODE	DATE REQUIRED 1/29/92	TERMS	ALLOWABLE OVER % SHIPMENT UNDER

**SUGGESTED  
VENDOR:**  
(name, address  
and phone)

013 (1/10/92 FIRE)

ITEM NO.	QUANTITY	U/M	DESCRIPTION	COMMODITY CODE	UNIT PRICE
	20,000g		DISPOSAL OF WATER FROM EXTINGUISHING OF FIRE		.17/GAL
	4		LOADS TRANSPORTATION PER LOAD		\$525.00
			1 of 4 loads		

COMPLETE ONE OF THESE BOXES		NAME-VENDOR #1	NAME-VENDOR #2	NAME-VENDOR #3
<input checked="checked" type="checkbox"/>	PURCHASE ORDER REQUEST	PRICE	PRICE	PRICE
<input type="checkbox"/>	SERVICE ORDER REQUEST	F.O.B.	F.O.B.	F.O.B.
<input type="checkbox"/>	BLANKET ORDER REQUEST	TERMS	TERMS	TERMS
<input type="checkbox"/>	BLANKET RELEASE			

PURCHASING COPY



# Waste Conversion

2889 Sandstone Drive Hatfield, Penna. 19440

B/L Number <u>P63555</u> Date <u>11-30-92</u>		STRAIGHT BILL OF LADING NON-NEGOTIABLE		COMMONWEALTH OF PENNSYLVANIA DEPT. OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT PROCESSING FACILITY PERMIT NO. 300894	
Received, subject to the classification and tariffs in effect on the date of issue of this original Bill of Lading.					
DATE OF PICKUP <u>11-30-92</u>		EPA IDENTIFICATION CODE NO. <u>PA0852217892</u>			
GENERATOR <u>Reichold Chemical Inc</u>		ADDRESS <u>400 BOKERUS AVE</u>			
CITY <u>HATFIELD</u>		STATE <u>PA</u> ZIP <u>19405</u>		PHONE <u>201 589 3789</u>	
TAYLOR					
US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		Containers	Total Quantity	Unit	
Waste Water and Sludge Non-Hazardous Material (Water Based and Ash)		600	5000	G	
b.					
c.					
d.					
Additional Information/Lab Code					
a. <u>WL26839</u>					
b.					
SPECIAL HANDLING INSTRUCTIONS/COMMENTS: <u>NON HAZARDOUS WASTE</u> <u>PER 40 CFR PART 261</u>				PLACARDS PROVIDED: <u>Drive Safely</u>	
EMERGENCY INFORMATION: Call Generator, (print) <u>Reichold Chemical Inc</u>				CALL: CHEMTREK 1-800-424-9303 Phone No. A/C <u>201 589 3789</u>	
GENERATOR CERTIFICATION: I certify that the materials described above are properly described, classified, packaged, marked and labeled and are in proper condition for commerce under the applicable regulations of the Federal Environmental Protection Agency and the Federal Department of Transportation and delays are noted. Print Name <u>GARY W. HESTON</u> Signature <u>Gary W. Heston</u> Date Shipped <u>11/30/92</u>					
TRANSPORTER COMPANY <u>WASTE CONVERSION, INC.</u>		EPA IDENTIFICATION CODE NO. <u>PA</u>		ADDRESS <u>2889 SANDSTONE DRIVE</u>	
CITY <u>HATFIELD</u>		STATE <u>PA</u> ZIP <u>19440</u>		PHONE <u>215-822-8986</u>	
This is to certify acceptance of the above described waste for transportation.					
PRINT NAME <u>GARY W. HESTON</u>		SIGNATURE <u>Gary W. Heston</u>			
DEPARTED		A.M. P.M.		ARRIVE WASTE CONVERSION	
ARRIVAL AT CUSTOMER		/		TOTAL DELAY TIME <u>12 HR</u>	
STARTED LOADING				REASON FOR DELAY <u>SEE KTR BL #</u>	
END LOADING				TRACTOR NO. <u>30</u> TRAILER NO. <u></u>	
DEPARTED CUSTOMER					
CONSIGNEE/TREATMENT/STORAGE/DISPOSAL FACILITY		EPA IDENTIFICATION CODE NO. <u>PAD085690592</u>			
CONSIGNED TO <u>WASTE CONVERSION, INC.</u>		ADDRESS <u>2889 SANDSTONE DRIVE</u>			
CITY <u>HATFIELD</u>		STATE <u>PA</u> ZIP <u>19440</u>		PHONE <u>215-822-8986</u>	
THIS IS TO CERTIFY THE ACCEPTANCE OF THIS WASTE FOR TREATMENT STORAGE DISPOSAL					
PRINT NAME		SIGNATURE			

White - GENERATOR FILE  
Blue - TRANSPORTER FILE  
Green - PROCESSING FACILITY

Yellow - RETURN TO GENERATOR  
Pink - BILLING FILE

842899724

HOLD CHEMICALS, INC. 10000 SANDSTONE DRIVE RESEARCH TRIANGLE PARK, NC 27709	FOR HELP IN CHEMICAL EMERGEN- CIES INVOLVING SPILL, LEAK, FIRE OR EXPOSURE, CALL TOLL FREE DAY OR NIGHT CHEMTREC: 800-424-9300	Shipped by _____ to apply in payment of the charges on the property described herein. Agent or Carrier (The signature here acknowledges only the amount prepaid.) Charges Advanced \$
-----------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

CARRIER TRUCKING	SHIPPER'S MARK 952411
---------------------	--------------------------

NO. OF PACKAGES	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name and Class per 49 CFR 172.201)	QUANTITY	UNIT	PROD. CODE
	NON HAZARDOUS WASTE WAX NON DOT REGULATED MATERIAL	5000	GRAMS	

IT 1 TO: RESS	COD Amt. \$	C.O.D. FEE: PREPAID <input type="checkbox"/> COLLECT <input type="checkbox"/> \$
NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding. \$ _____ per _____	Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignee, the carrier shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. _____ (Signature of Carrier)	TOTAL CHARGES: \$ FREIGHT PREPAID <input type="checkbox"/> Check box if charges except when box at right is checked. <input type="checkbox"/> are to be collected.

HOLD CHEMICALS, INC., Shipper, 10000 SANDSTONE DRIVE RESEARCH TRIANGLE PARK, NC 27709	Carrier hereby acknowledges that the shipper provided the required placards for the hazardous materials named on this Bill of Lading. Carrier certifies that the container supplied by carrier for this shipment is a proper container for the transportation of the commodities named on this Bill of Lading. Agent _____ Per _____
---------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**K&B TRUCKING**  
 21 CHURCH RD., HATFIELD, PA 19440  
 (215) 997-9111 FAX (215) 997-9110

**BILL OF LADING**  
 KB 16809

SHIPPER/GENERATOR  REICHOOLD CHEMICAL		DATE OF RAI 7-30-92	ADDITIONAL DOCUM (B/L & MANIFEST)
LOADING LOCATION CITY NEWARK STATE NJ		TRACTOR # 30	P63555
LOAD DESCRIPTION WASTE WATER AND ASH NON DOT REGULATED MATERIAL WATER-RESIN AND ASH		TRAILER # 1060	
		BOX SPOTTED	
		BOX PICKED UP	
		QUANTITY VOLUME 5000 GAL	
START TIME: 800 AM	REASON FOR DELAY (as much detail as possible) WAITING FOR CONTACT TO TELL ME W.		
ARRIVAL @GENERATOR 1015 AM	LOAD - LOADING FROM TWO DIFF		
DEPART GENERATOR 1143 AM	TANKERS. PAPER WORK - THERE'S		
DELAY TIME 1/2 HR	OURS. CALL IN WAY FOR THERE PAPER		
GENERATOR SIGNATURE <i>[Signature]</i>		DATE	
DISPOSAL FACILITY INFORMATION (FACILITY NAME)  WASTE CONVERSION, INC.		REASON FOR DELAY (as much detail as possible)	
FACILITY LOCATION  CITY HATFIELD STATE PA			
ARRIVAL TIME: AM/PM	ADDITIONAL EQUIPMENT/COMMENTS		
DEPARTURE TIME: AM/PM			
DELAY TIME:			
FINISH TIME: AM/PM			
TSDF REPRESENTATIVE SIGNATURE		DATE	
DRIVER PRINT <i>GARY W. HESTON</i>	DRIVER SIGN <i>[Signature]</i>	DATE	
BILLING INFORMATION (OFFICE USE ONLY)			
CUSTOMER		P.O. #	
TRANSPORTATION PRICE		SPOTTING CHARGE: LINER CHARGE:	
GENERATOR DELAY: hrs. @			
DISPOSAL DELAY: hrs. @			
ADDITIONAL BILLING INFO.			

842899726

WHITE-GENERATOR GREEN-BILLING YELLOW-K&B FILE PINK-PAYROLL GOLD-DISPOSAL FACILITY

## STRAIGHT BILL OF LADING—SHORT FORM—Original—Not Negotiable

CARRIER:

RECEIVED, subject to the classification and tariffs in effect on the date of issue of this Bill of Lading.  
FROM REICHHOLD CHEMICALS, INC.CAR OR VEHICLE  
INITIALS AND NO.

1060

952411

DESIGNED TO *013*  
Ship or Street Address of Consignee For Purpose of Notification OnlyTo be filled in only when shipper desires and  
governing tariffs pertain to delivery thereof.WASTE CONVERSION INC  
2869 SANDSTONE DRIVE  
HATFIELD PA 19440FOR HELP IN CHEMICAL EMERGEN-  
CIES INVOLVING SPILL, LEAK, FIRE  
OR EXPOSURE, CALL TOLL FREE  
DAY OR NIGHT

CHEMTREC: 800-424-9300

Received \$ \_\_\_\_\_  
to apply in prepayment of the charges on  
the property described herein.

Agent or Cashier

Per \_\_\_\_\_  
(The signature here acknowledges only  
the amount prepaid.)

Charges Advanced

\$

CUST. ORDER NO.

SH. DATE

1 30 92

CAR INITIALS &amp; NO.

1060

SHIPPER'S NUMBER

952411

REMARKS *K.B. TRUCKING*PREPAID \$  
ALLOWED CHANGE COLLECT

NO. / TYPE PACKAGES	HM	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name and Class per 49 CFR 172.101)	GROSS	NET	PROD. CODE
		NON HAZARDOUS WASTE WATER NON DOT REGULATED MATERIAL		5000 GAL	

IIT  
D. TO:  
DRESSis to certify that the above-named materials  
properly classified, described, packaged, marked  
labeled and are in proper condition for transporta-  
tion according to the applicable regulations of the  
Department of Transportation.NOTE—Where the rate is dependent on value, shippers are  
required to state specifically in writing the agreed or declared  
value of the property.  
The agreed or declared value of the property is hereby  
specifically stated by the shipper to be not exceeding  
\$ \_\_\_\_\_ per \_\_\_\_\_

COD

Amt. \$

Subject to Section 7 of the conditions, if this shipment is to be delivered to  
the consignee without recourse on the consignor, the consignor shall sign the  
following statement.The carrier shall not make delivery of this shipment without payment of  
freight and all other lawful charges.

(Signature of Consignor)

C.O.D. FEE:  
PREPAID ☐  
COLLECT ☐

\$

TOTAL  
CHARGES: \$FREIGHT CHARGES  
FREIGHT PREPAID Check box if charges  
except when box at ☐ are to be  
right is checked. collected.

REICHHOLD CHEMICALS, INC., Shipper,

*John Kohn* 1/30/92  
nearest post office address of shipper, P.O. BOX 13582  
RESEARCH TRIANGLE PARK, NC 27709

842899727

Carrier hereby acknowledges that the shipper provided the  
required placards for the hazardous materials named on this Bill  
of Lading.

INITIAL: \_\_\_\_\_

Carrier certifies that the container supplied by carrier for this  
shipment is a proper container for the transportation of the  
commodities named on this Bill of Lading.Agent *George H. Hester*

Per \_\_\_\_\_

1

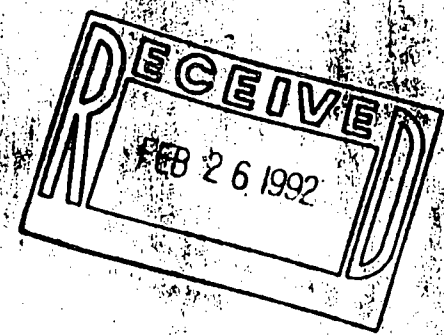
**842899728**

001	1.00	GL	1.00	SHIP
002	1.00	EA	1.00	LVC5
003	1.00	LD	1.00	TRANS
004	1.00	HR	1.00	DT7
005	1.00			

02/11/92  
LOAD VERIFICATION CHARGE  
TRANSPORTATION  
DELAY TIME  
K&B B/L #16816

525.0000  
75.0000

5.00



SUB-TOTAL		841.93	SALES TAX		.00	RATE .0000	FREIGHT	.00	PLEASE PAY THIS AMOUNT	841.93
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ORIGINAL

842899729

**WC****WC**

# Waste Conversion Inc.

2889 Sandstone Drive / Hatfield, Pennsylvania 19440 / 215-822-8996

EPA I.D. #PAD085690592

**CERTIFICATE OF WASTE DISPOSAL NUMBER 92-0889**

THIS IS TO CERTIFY THAT WASTE MATERIAL RECEIVED FROM

Generator REICHOLD CHEMICALE.P.A. ID # NJD092217892Address 400 DONEMUS AVENUE, NEWARK, NJ 07105AS REFERENCED ON MANIFEST NUMBER P63786HAS BEEN DISPOSED OF IN ACCORDANCE WITH ALL  
APPLICABLE LOCAL, STATE, AND FEDERAL  
REGULATIONS IN THE FOLLOWING MANNER

Lab Code/Clin #

D.O.T./E.P.A. Description

Treatment/Disposal Method

WL26839WASTE PROCESS WATERS02.T45.T40 FEBRUARY 13, 1992

*George S. Smith III*  
W.C.I. Representative - Title  
GEORGE S. SMITH III

DOCUMENT MANAGER

02/13/92  
Date

842899730

**WC****WC**

# Waste Conversion INC.

2889 Sandstone Drive / Hatfield, Pennsylvania 19440 / 215-822-8998

EPA I.D. #PAD085890592

**CERTIFICATE OF WASTE DISPOSAL NUMBER** 92-0817

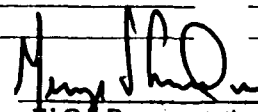
THIS IS TO CERTIFY THAT WASTE MATERIAL RECEIVED FROM

Generator REICHOLD CHEMICAL  
E.P.A. ID # NJD048797195  
Address 46 ALBERT AVENUE, NEWARK, NJ 07105

AS REFERENCED ON MANIFEST NUMBER P63942

HAS BEEN DISPOSED OF IN ACCORDANCE WITH ALL  
APPLICABLE LOCAL, STATE, AND FEDERAL  
REGULATIONS IN THE FOLLOWING MANNER

Lab Code/Clin #	D.O.T./E.P.A. Description	Treatment/Disposal Method
<u>WL26828</u>	<u>WASTE PROCESS WATER</u>	<u>S02,T45,T40 FEBRUARY 06, 1992</u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>



V.C.I. Representative - Title  
**GEORGE S. SMITH III**

DOCUMENT MANAGER

02/10/92

Date

842899731



9/13/94

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• mitte 60er

NAME \_\_\_\_\_

\_\_\_\_\_

SECRET

**2/11/2014**

# WALL

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**THE UNIVERSITY OF CHICAGO**

100-443887-100

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*Journal of Management Education* 30(6)

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*Journal of Management Studies*, 19(6), 701-718.

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**842899732**

## PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

Bureau of Waste Management

P. O. Box 8550

Harrisburg, PA 17105-8550

FOR SHIPMENT OF HAZARDOUS, INFECTIOUS  
AND CHEMOTHERAPEUTIC WASTE.

Form approved.

OMB No. 2050-0039

Expires 9-30-92

ER-WM-51 REV. 1/91

## OFFICIAL PENNSYLVANIA MANIFEST FORM

234.23 Rem

UNIFORM HAZARDOUS  
WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest  
Document No.2. Page 1  
of 1Information in the shaded areas  
is not required by Federal law  
but is required by State law.

3. Generator's Name and Mailing Address

Reichold Chemical Inc.  
400 Doremus Ave.  
Newark, NJ 07105A. State Manifest Document Number  
PAC 5756623

B. State Gen. ID

SAME

4. Generator's Phone (201) 569-3709

5. Transporter 1 Company Name

S-J Transportation Co.

6. US EPA ID Number

NJ D 07 16 299 76

C. State Trans. ID

PA- AH 00 15

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone (609) 769-2743

E. State Trans. ID

PA- 00 15

9. Designated Facility Name and Site Address

Waste Conversion Inc.  
2869 Sandstone Drive  
Hatfield, PA 19440

10. US EPA ID Number

PA D 08 56 90 592

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone (215) 822-8996

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

13.  
Total  
Quantity14.  
Unit  
WL/Vol15.  
Waste No.a. RQ, Waste Flammable Liquid NOS  
flammable Liquid UN1993  
(thinner and water)

D001

0 1 0 1

T T

0 5 1 0 0 0 0

G

D 0 0 1

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

Lab Pack

Physical State

Lab Pack

Physical State

a. ☐ I. WL26839 (I)c. ☐

K. Handling Codes for Wastes Listed Above

a. S02

c.

b. ☐d. ☐

b.

d.

15. Special Handling Instructions and Additional Information

Emergency Contact: R NAUSEL  
Emergency Phone: 201 589 370  
Emergency Guide No.: 27

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

ROBERT NAUSELIS

Signature

Robert Nauselis

MONTH DAY YEAR

10 13 1992

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

JERRY L DAVIS

Signature

Jerry L Davis

MONTH DAY YEAR

10 13 1992

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

MONTH DAY YEAR

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Paul Connell

Signature

Paul Connell

MONTH DAY YEAR

10 13 1992

842899734

# Waste Conversion INC.

Subsidiary of Stout Environmental Inc.  
2869 Sandstone Drive  
Hatfield, PA. 19440  
215-822-2676 • Fax 215-997-1315  
EPA #085690592 FED. ID. #23-2146567

\* \* INVOICE \* \*

023783

01 14 453371  
B I L L  
REICHOLD CHEMICAL  
400 DOREMUS AVENUE  
NEWARK, NJ 07105

G E N E R A T O R  
REICHOLD CHEMICAL  
400 DOREMUS AVENUE  
NEWARK, NJ 07105

DATE  
02/27/92

PAGE 1

CUSTOMER P.O. 000116		SALES PERSON JAMES SHERRIER		HAULER S&J TRANS		FOB .		TERMS NET 30 DAYS		OUR ORDER NO. AND DATE 24349 02/26/92		INSTR	
L/I	QTY. ORDERED	U/M	QTY. PICKUP	*	LAB CODE	DESCRIPTION/MANIFEST NUMBER			UNIT PRICE	AMOUNT			
						RECEIVED 5000 GALLONS OF OFF SPEC MATERIAL - HAD TO BE SHIPPED TO ALTERNATE FACILITY FOR DISPOSAL							
001	1.00	EA	1.00		DISP	DISPOSAL			11250.0000	11,250.00			
002	1.00	LD	1.00		TRANS	5000 GAL X 2.25/GAL TRANSPORTATION			525.0000	525.00			
003	1.00	LD	1.00		TRANS	NEWARK TO WASTE CONVERSION			500.0000	500.00			
004	1.00	HR	1.00		DT	TRANSPORTATION WASTE CONVERSION TO DELAWARE CONTAINER			750.0000	750.00			
005	1.00	EA	1.00		LVC5	DEMURRAGE TIME THREE (3) DAYS X \$250/DAY FOR TANKER			50.0000	50.00			
						LOAD VERIFICATION CHARGE							
					RECEIVED 1/31/92 MA 1392 By _____		P63730 PAC 5756623						
SUB-TOTAL		13,075.00		SALES TAX		.00		RATE .0000		FREIGHT .00		PLEASE PAY THIS AMOUNT	13,075.00

*[Signature]*  
3/9/92

ORIGINAL





# Waste Conversion INC.

Secretary of State Environmental Inc.  
2869 Sandstone Drive  
Hatfield, PA. 19440  
215-822-2678 • Fax 215-997-1315  
EPA #085690592 FED. ID. #23-2146567

★ ★ INVOICE ★ ★

842899737

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REICHOLD CHEMICAL  
400 DOREMUS AVENUE  
NEWARK, NJ 07105

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REICHOLD CHEMICAL  
400 DOREMUS AVENUE  
NEWARK, NJ 07105

023361

DATE

01/31/92

PAGE

1

CUSTOMER P.O.		SALES PERSON		HAULER		F.O.B.		TERMS		OUR ORDER NO. AND DATE		INSTR								
000116		JAMES SHERRIER		WCI		.		NET 30 DAYS		23932 01/31/92										
LI	QTY. ORDERED	U/M	QTY. PICKUP	*	LAB CODE	DESCRIPTION/MANIFEST NUMBER				UNIT PRICE	AMOUNT									
001	5,000.00	GL	5,000.00		WL26839	WATER FROM FIRE WATER NON-HAZARDOUS				.1700	850.00									
002	1.00		1.00		SHIP	01/30/92 P63555 952411				.0000	.00									
003	.50	HR	.50		DT7	DELAY TIME K&B B/L #16809				75.0000	37.50									
004	5,465.00	GL	5,465.00		WL26839	WATER FROM FIRE WATER NON-HAZARDOUS				.1700	929.05									
005	1.00		1.00		SHIP	01/30/92 P60428 952409				.0000	.00									
006	.50	HR	.50		DT7	DELAY TIME K&B B/L #14111				75.0000	37.50									
007	2.00	EA	2.00		LVC5	LOAD VERIFICATION CHARGE				50.0000	100.00									
008	2.00	LD	2.00		TRANS	TRANSPORTATION				525.0000	1,050.00									
<div>2/13 about 1,100g</div>																				
SUB-TOTAL			3,004.05		SALES TAX		.00		RATE		.0000		FREIGHT		.00		PLEASE PAY THIS AMOUNT		3,004.05	

ORIGINAL

2/13 about 1,100 g

**WC****WC**

# Waste Conversion INC.

2869 Sandstone Drive / Hatfield, Pennsylvania 19440 / 215-822-8996

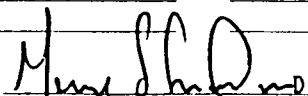
EPA I.D. #PAD085690592

**CERTIFICATE OF WASTE DISPOSAL NUMBER** 92-0586

THIS IS TO CERTIFY THAT WASTE MATERIAL RECEIVED FROM

Generator REICHOID CHEMICALE.P.A. ID # NJD092217892Address 400 DONEMUS AVENUE, NEWARK, NJ 07105AS REFERENCED ON MANIFEST NUMBER P60428HAS BEEN DISPOSED OF IN ACCORDANCE WITH ALL  
APPLICABLE LOCAL, STATE, AND FEDERAL  
REGULATIONS IN THE FOLLOWING MANNER

Lab Code/Clin #	D.O.T./E.P.A. Description	Treatment/Disposal Method
<u>WL 26839</u>	<u>WASTE PROCESS WATER</u>	<u>S02, T45, T40 JANUARY 31, 1992</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

  
W.C.I. Representative - Title

GEORGE S. SMITH III

DOCUMENT MANAGER

01/31/92

Date

842899738

## CARRIER:

CAR OR VEHICLE  
INITIALS AND NO

1550

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading,  
FROM REICHHOLD CHEMICALS, INC. at

952409

## ROUTE

013

Delivery  
Address\*To be filled in only when shipper desires and  
governing tariffs provide for delivery thereat.)

CONSIGNED TO (Name or Street Address of Consignee for Purposes of Notification Only)

WASTE CONVERSION  
2869 SANDSTONE DR.  
HATFIELD PA 19440FOR HELP IN CHEMICAL EMERGEN-  
CIES INVOLVING SPILL, LEAK, FIRE  
OR EXPOSURE, CALL TOLL FREE  
DAY OR NIGHT  
CHEMTREC: 800-424-9300Received \$ \_\_\_\_\_  
to apply in prepayment of the charges  
the property described hereon.

Agent or Cashier

Per \_\_\_\_\_  
(The signature here acknowledges  
the amount prepaid.)

Charges Advanced

\$

CUST. ORDER NO.

SH. DATE

CAR INITIALS &amp; NO

SHIPPER'S NUMBER

1

30 92

1550

952409

SHIPPED VIA:

K.B. TRUCKING

PREPAID &  
ALLOWED CHARGE

COLLECT

NO./TYPE  
PACKAGES

HM 1

DESCRIPTION AND CLASSIFICATION  
(Proper Shipping Name and Class per 49 CFR 172.101)

GROSS

NET

PROD. CODE

NON HAZARDOUS WASTE WATER  
NON REGULATED5465  
~~5000~~  
GALREMIT  
C.O.D. TO:  
ADDRESS

COD

Amt. \$

C.O.D. FEE:  
PREPAID ☐  
COLLECT ☐

\$

This is to certify that the above-named materials  
are properly classified, described, packaged, marked  
and labeled and are in proper condition for transportation  
according to the applicable regulations of the  
Department of Transportation.NOTE—Where the rate is dependent on value, shippers are  
required to state specifically in writing the agreed or declared  
value of the property.  
The agreed or declared value of the property is hereby  
specifically stated by the shipper to be not exceeding:

\$ \_\_\_\_\_ per \_\_\_\_\_

Subject to Section 7 of the conditions, if this shipment is to be delivered to  
the consignee without recourse on the consignor, the consignor shall sign the  
following statement:  
The carrier shall not make delivery of this shipment without payment of  
freight and all other lawful charges.

(Signature of Consignor)

TOTAL  
CHARGES: \$ \_\_\_\_\_  
FREIGHT PREPAID ☐ Check box if charges  
except when box at ☐ are to  
right is checked. ☐ collect

REICHHOLD CHEMICALS, INC., Shipper,

Per Glenn Kathan  
Permanent post-office address of shipperP.O. BOX 13582  
RESEARCH TRIANGLE PARK, NC 27709Carrier hereby acknowledges that the shipper provided the  
required placards for the hazardous materials named on this Bill  
of Lading.

INITIAL: \_\_\_\_\_

Carrier certifies that the container supplied by carrier for  
shipment is a proper container for the transportation of  
commodities named on this Bill of Lading.

INITIAL: \_\_\_\_\_

Agent Moby Dancer

Per \_\_\_\_\_



# REICHOLD

# PURCHASE REQUISITION

ROUTE AND APPROVAL TO:

REQUISITION NO. <b>007624</b>		C E A R NO YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		REQUISITION DATE <b>2/11/92</b>	
RECEIVING POINT <b>013 - Doberman</b>		VENDOR CODE <b>1000</b>		TAX % WHEN EXEMPT SHOW NO OR TAX AUTH <b>#</b>	
SHIP VIA <b>Amex Bx</b>		1 OR 1 DESTINATION 2 SHIP PT 3 OTHER CODE <b>1000</b>		DATE REQUIRED <b>2/11/92</b>	
TERMS <b>NET 30</b>		ALLOWABLE OVER <b>0.00</b>		SHIPMENT UNDER <b>0.00</b>	

SUGGESTED  
VENDOR:

(name, address  
and phone)

## Waste Conversion

SHIP TO

013, *Doreurus* Mc

NAME Mike Bax

INITIALS \_\_\_\_\_ DATE \_\_\_\_\_

NAME \_\_\_\_\_

INITIALS	DATE
----------	------

PURCHASING APPROVAL

INITIALS \_\_\_\_\_ DATE \_\_\_\_\_

ITEM NO	QUANTITY	U/M	DESCRIPTION	COMMODITY CODE	UNIT PRICE	LOCATION	COST CENTER	EXPENSE CODE	COMM CODE
1	5000 <sup>cu</sup> yds		Fire water Disposal to waste conversion -		\$ 0.17/yd				
			Trans -		\$ 525.00				
			Delay time		\$ 75.00/hr				
2	5465.00 yds		Two shipments -						
			(1) 1/30/92						
			(2) 1/30/92						
					\$ 3004.05				

COMPLETE ONE OF THESE BOXES		NAME VENDOR #1	NAME VENDOR #2	NAME VENDOR #3
<div style="border: 1px solid black; padding: 2px; display: inline-block;"> <input checked="" type="checkbox"/> </div>	PURCHASE ORDER REQUEST	PRICE	PRICE	PRICE
	SERVICE ORDER REQUEST	FOB	FOB	FOB
	BLANKET ORDER REQUEST	TERMS	TERMS	TERMS
	BLANKET RELEASE			

REQUISITIONER

**842899740**

# REICHHOLD

# PURCHASE REQUISITION

C.E.A.R. REQUIRED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		C.E.A.R. NO.	REQUISITION DATE <del>2/24/92</del>	REQ. NO. <b>R 007639</b>
REQUISITIONER <i>Mike Baxi</i>	RECEIVING POINT <i>013 / DoRemy's</i>	VENDOR CODE	TAX % - WHEN EXEMPT SHOW NO. OR TAX AUTH. #	
SHIP VIA	F.O.B. 1-DESTINATION 2-SHIP PT. 3-OTHER CODE	DATE REQUIRED <i>3/13/92</i>	TERMS	ALLOWABLE OVER % SHIPMENT UNDER

**SUGGESTED  
VENDOR:**

(name, address  
and phone)

WASTE CONVERSION <sup>S</sup>HIP 013, Doremus Avenue

SHIP 

ITEM NO.	QUANTITY	U/M	DESCRIPTION	COMMODITY CODE	UNIT PRICE
			Fire water Disposal		
			P.O.# 000116.		
			Water shipped to Waste Conversion & then to Delaware Container for final Disposal.		
					\$ 13,075

ROUTING AND APPROVAL TO:	
NAME	Mike Buxi
INITIALS	MB
NAME	
INITIALS	
PURCHASING APPROVAL	
INITIALS	
DATE	

[illegible]

COMPLETE ONE OF THESE BOXES <input checked="checked" type="checkbox"/> PURCHASE ORDER REQUEST <input type="checkbox"/> SERVICE ORDER REQUEST <input type="checkbox"/> BLANKET ORDER REQUEST <input type="checkbox"/> BLANKET RELEASE	NAME-VENDOR #1	NAME-VENDOR #2	NAME-VENDOR #3
	PRICE	PRICE	PRICE
	F.O.B.	F.O.B.	F.O.B.
	TERMS	TERMS	TERMS

**842899741**

Driver Name E. J. O'Connell

CARRIER

P.O. Box 169  
Woodstown, N.J. 08098  
(609) 769-2741

Carrier's No. 58999  
Manifest No. \_\_\_\_\_  
Code No. \_\_\_\_\_  
Date \_\_\_\_\_

TO CONSIGNEE	FROM SHIPPER
STREET	STREET
DESTINATION STATE ZIP	ORIGIN STATE ZIP
Contact	Contact
Phone No.	Phone No. Vehicle Number

No. Shipping Units	HM	Kind of Packages, Description of Articles (IF HAZARDOUS MATERIALS - PROPER SHIPPING NAME)	HAZARD CLASS	I.D. Number	WEIGHT (subject to correction)
--------------------	----	----------------------------------------------------------------------------------------------	--------------	-------------	-----------------------------------

1	N. M. HATARD, JR. WHITE WATER (H. M. HATARD, JR.) VAL. 100 C. L. 10000 DEC. 10000 DEC. 10000 DEC. 10000	10000 10000	5000 10000
---	---------------------------------------------------------------------------------------------------------------------------	----------------	---------------

Consignee		Date	Cost	
Trailer Type	P/U Date	Del. Date	Gross Wt.	
	P/U Time	Del. Time	Tare Wt.	
	In Out	In Out	Net. Wt.	
Special Instruction & Explain Delay		Bill To:	P.O. No.	
		Contact:	Phone No.	

PER:

SHIPPER: <i>H. L. Smith</i>	CARRIER: <i>SJ Transportation Co., Woodstown, NJ 08098</i>
PER: <i>H. L. Smith</i>	PER: <i>H. L. Smith</i>
DATE: <i>1-31-92</i>	DATE: <i>1-31-92</i>
EMERGENCY RESPONSE	Manned 24 hours/day by a person with knowledge of the hazards of the material and emergency response information or who has access to a person with that knowledge.
TELEPHONE NUMBER: ( )	

842899742

# REICHHOLD

# PURCHASE REQUISITION

**ROUTING AND APPROVAL TO:**

- Mike Bucci.

NAME \_\_\_\_\_

INITIALS

DATE \_\_\_\_\_

NAME \_\_\_\_\_

INITIALS

DATE \_\_\_\_\_

**PURCHASING APPROVAL**

INITIALS

DATE \_\_\_\_\_

LOCATION	COST CENTER	EXPENSE CODE	COMM CODE
----------	-------------	--------------	-----------

C.E.A.R. REQUIRED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		C.E.A.R. NO.	REQUISITION DATE <del>2/24/92</del>	REQ. NO. R 007639
REQUISITIONER Mike Baxi		RECEIVING POINT 013 / Doremy	VENDOR CODE	TAX % - WHEN EXEMPT SHOW NO. OR TAX AUTHORITY #
SHIP VIA	F.O.B. 1-DESTINATION 2-SHIP PT. 3-OTHER CODE	DATE REQUIRED 3/13/92	TERMS	ALLOWABLE OVER % SHIPMENT UNDER

**SUGGESTED  
VENDOR:**

(name, address  
and phone)

WASTE CONVERSION <sup>S</sup>HIP 013, Doremi Avenue

SHIP-TO-

ITEM NO.	QUANTITY	DESCRIPTION	COMMODITY CODE	UNIT PRICE
		Five water Disposal		
		P.O.# 000116.		
		water shipped to Waste Conversion & then to Delaware container for final Disposal.		
				\$ 13,075

[illegible]

**COMPLETE ONE OF THESE BOXES**

<input checked="" type="checkbox"/>	PURCHASE ORDER REQUEST
<input type="checkbox"/>	SERVICE ORDER REQUEST
<input type="checkbox"/>	BLANKET ORDER REQUEST
<input type="checkbox"/>	BLANKET RELEASE

NAME-VENDOR #1

PRICE	
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**F.O.B.**

## TERMS

NAME-VENDOR #2

PRICE	
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F.O.B.	
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TERMS	
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NAME-VENDOR #3

PRICE
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	F.O.B.
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TERMS	
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**842899743**

# STRAIGHT BILL OF LADING

Short Form - Original - Not Negotiable

Driver Name JOHN J. JAMES  
**S - J TRANSPORTATION CO.**  
 P.O. Box 169  
 Woodstown, N.J. 08098  
 (609) 769-2741

Carrier's No. **58999**  
 Manifest No. 7-31-92  
 Code No. 100  
 Date 7-31-92

TO CONSIGNEE <u>WHITE CHROME INC.</u>		FROM SHIPPER <u>REYNOLDS CHEMICAL</u>	
STREET <u>1001 S. 1ST ST.</u>		STREET <u>400 DOUGLASS AVE.</u>	
DESTINATION <u>ATLANTA</u> STATE <u>GA</u> ZIP <u></u>		ORIGIN <u>NEWARK</u> STATE <u>NJ</u> ZIP <u></u>	
Contact <u></u>		Contact <u></u>	
Phone No. <u>215-892-0716</u>		Phone No. <u>201-589-1075</u>	
No. Shipping Units <b>HM</b>		Vehicle Number <u>(1853)</u>	
Kind of Packages, Description of Articles (IF HAZARDOUS MATERIALS - PROPER SHIPPING NAME)		HAZARD CLASS	
I.D. Number		WEIGHT (subject to correction)	

1	HAZARDOUS WASTE WATER (WASTE WATER) VALUATION QTL# 268x5 DECAL 30053 DEP 16042 100 24000	HAZARD CLASS REYNOLDS	5000
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Consignee		Date		Cost	
Trailer Type	PU Date <u>7-31-92</u>	Del. Date <u>7-31-92</u>	Gross Wt.		
	PU Time <u>9:00</u>	Del. Time	Tare Wt.		
	In <u>10:00</u> Out <u>10:00</u>	In Out	Net Wt.		
Special Instruction & Explain Delay <u>HAZARDOUS WASTE</u>		Bill To: <u>REYNOLDS CHEMICAL</u> P.O. No. <u></u>			
		Contact: <u>201-589-1075</u> Phone No. <u></u>			

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation

PER:

SHIPPER: <u>James K. James</u>	CARRIER: <u>S-J Transportation Co. - Woodstown, NJ 08098</u>
PER: <u></u>	PER: <u>James K. James</u>
DATE: <u>7-31-92</u>	DATE: <u>7-31-92</u>
EMERGENCY RESPONSE	Manned 24 hours/day by a person with knowledge of the hazards of the material and emergency response information or who has access to a person with that knowledge.
TELEPHONE NUMBER: <u>( )</u>	

FOR HELP IN CHEMICAL EMERGENCIES INVOLVING SPILL, LEAK,  
 FIRE OR EXPOSURE CALL TOLL-FREE 1-800-424-9300 DAY OR NIGHT

842899744

# Waste Conversion INC.

Subsidiary of Stout Environmental Inc.

2869 Sandstone Drive/Hatfield, PA 19440/215-822-8998/FAX 215-822-1293

TO: Bob Naiselis

FROM: Greg Brendlinger

WASTE CONVERSION, INC.

YOU SHOULD RECEIVE 3 SHEETS  
INCLUDING THIS ONE.

IF THE APPROPRIATE NUMBER OF SHEETS ARE NOT RECEIVED  
IN LEGIBLE CONDITION IMMEDIATELY PHONE THE SENDER AT  
NUMBER STATED ABOVE.



A COMPLETE ENVIRONMENTAL SERVICE COMPANY  
COMPANY

842899745

Waste Conversion Inc./Subsidiary of Stout Environmental Inc.  
2889 Sandstone Drive/Hatfield, PA 19440/215-822-8996/FAX 215-822-1293

LABORATORY ANALYSIS REPORT

Client: REICHOID CHEMICAL  
Address: 400 DOREMUS AVENUE  
NEWARK NJ 07105

Date Received: 02/04/92

Manifest Number: NJD092217892

Sample Identification: FIRE WASH WATER  
REFERENCE # WL26839

Analytical Parameter Priority Pollutants	Sample Number	
	GROSS	
Specific Gravity	1.01	
pH	5.43	
Flashpoint	55 F	
Reactivity	NONE	
Odor	SOLVENT	
Color	CLEAR/GREY	
% Free Oil	5% ORGANIC PHASE	
Physical Description	WATER FROM FIRE	
TOC, mg/L	3,346/3,326	
Total Solids, %	0.96	

\*LESS THAN METHOD  
DETECTION LIMITS

Approved By:

Date:

Denny D. Hill

2/10/92

Waste Conversion Inc./Subsidiary of Stout Environmental Inc.  
2869 Sandstone Drive/Hatfield, PA 19440/215-822-8996/FAX 215-822-1293

LABORATORY ANALYSIS REPORT

Client: REICHOLD CHEMICAL  
Address: 400 DOREMUS AVENUE  
NEWARK NJ 07105

Date Received: 02/04/92

Manifest Number: NJD092217892

Sample Identification: FIRE WASH WATER  
REFERENCE # WL26839

VOLATILE ORGANIC COMPOUNDS	Sample Number	
	CONCENTRATION-	PPM
Methanol	ND	
Ethanol	ND	
Acetone	ND	
Isopropanol	ND	
Methylenechloride	ND	
Propanol	ND	
Methylalkylketone	< 1.07 *	
Ethyl Acetate	ND	
IsoButanol	ND	
111-Trichloroethane	ND	
Benzene	4.77	
Butanol	ND	
Carbontetrachloride	ND	
2-Pentanone	ND	
2-Nitropropane	ND	
TCE	ND	
MIBK	ND	
112-Trichloroethane	ND	
Toluene	31.5	
Tetrachloroethylene	1.02	
Chlorobenzene	4.50	
Ethylbenzene	380	
MP-Xylene	72.9	
O-Xylene	3.31	
1122-Tetrachloroethane	ND	

\* LESS THAN METHOD DETECTION LIMITS

ND=NONE DETECTED

APPROVED BY:

Dewey D. [Signature]

DATE:

2/10/92



# Waste

201 817 4173

# Conversion INC.

Subsidiary of Stout Environmental Inc.

2869 Sandstone Drive/Hatfield, PA 18440/215-822-8996/FAX 215-822-1283

TO: Mike Bopu

FROM: Paul Fantasia

WASTE CONVERSION, INC.

YOU SHOULD RECEIVE 3 SHEETS  
INCLUDING THIS ONE.

IF THE APPROPRIATE NUMBER OF SHEETS ARE NOT RECEIVED  
IN LEGIBLE CONDITION IMMEDIATELY PHONE THE SENDER AT  
NUMBER STATED ABOVE.



A COMPLETE ENVIRONMENTAL SERVICE COMPANY  
COMPANY

842899748

Waste Conversion Inc./Subsidiary of Stout Environmental Inc  
2869 Sandstone Drive/Hatfield, PA 19440/215-822-8996/FAX 215-822-1293

LABORATORY ANALYSIS REPORT

Client: REICHOLD CHEMICAL  
Address: 400 DOREMUS AVENUE  
NEWARK NJ 07105

Date Received: P.O.

Sample Identification: FIRE WASH WATER  
REFERENCE # WL26839

VOLATILE ORGANIC COMPOUNDS	Sample Number	
	CONCENTRATION-	PPM
Methanol	ND	
Ethanol	ND	
Acetone	ND	
Isopropanol	ND	
Methylenechloride	< 1.07 *	
Propanol	ND	
Methylethylketone	ND	
Ethyl Acetate	ND	
IsoButanol	4.77	
111-Trichloroethane	ND	
Benzene	ND	
Butanol	ND	
Carbontetrachloride	ND	
2-Pentanone	ND	
2-Nitropropane	ND	
TCE	ND	
MIBK	ND	
112-Trichloroethane	ND	
Toluene	31.5	
Tetrachloroethylene	1.02	
Chlorobenzene	4.50	
Ethylbenzene	380	
MP-Xylene	72.9	
O-Xylene	3.31	
1122-Tetrachloroethane	ND	

ND=NONE DETECTED

APPROVED BY:

Dewey D. Hest

DATE:

2/6/92

Waste Conversion Inc./Subsidiary of Stout Environmental Inc.  
2869 Sandstone Drive/Hatfield, PA 19440/215-822-8996/FAX 215-822-1293

LAB ANALYSIS BILLING REPORT

DATE: FEBRUARY 6, 1992

PAGE 1 OF 1

GENERATOR SITE ADDRESS:

BILLING ADDRESS:

REICHOLD CHEMICAL  
400 DOREMUS AVENUE  
NEWARK NJ 07105

SAME

BROKER: / GENERATOR: X

P.O. #

SUBMITTAL IDENTIFICATION	TESTING	FEE
SAMPLE ID: FIRE WASH WATER	pH: Ign/Flash:	\$ N/C
REFERENCE #: WL26839	Reactivity:	
PHYSICAL STATE: LIQUID	VOA: X PCB's:	
	Metals:	
	EP TOX:	
	GROSS:	
	EPL:	
	TCLP: ZHE:	
	OTHER:	

\*\*\*\*\*

TOTAL ..... \$ N/C

ALESMAN: KARL KRIGER

842899750

# REICHOLD CHEMICALS, INC.

COATING POLYMERS & RESINS DIVISION

CAPITAL EXPENDITURE APPROPRIATION REQUEST  
FOR

NEWARK – DOREMUS AVE. PLANT REHABILITATION

NEWARK, NJ

COPY

JANUARY 7, 1993

842899751

## NEWARK – DOREMUS AVE. PLANT REHABILITATION

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# CAPITAL EXPENDITURE APPROPRIATION REQUEST

Attachment 1(a)

Project Sponsor <u>R. P. ASTON</u>	Date <u>JAN. 4, 1993</u>	RFA No. <u>2492</u>	Date Assigned <u>JAN. 4, 1993</u>
Location <u>013 - NWK(D)</u>	Cost Center <u>018</u>	Included in Current Year's Budget? <u>YES - 1993</u>	

**Project Title:** NEWARK - DOREMUS AVE. PLANT REHABILITATION

**Total Project Cost:** \$800,000      **Estimated Time to Completion (After Approval):** 10 MONTHS

**Asset Classification: (Check All That Apply)**

<input type="checkbox"/> Automobiles & Trucks	<input type="checkbox"/> Laboratory Equipment	<input type="checkbox"/> Pollution Control -Buildings
<input checked="" type="checkbox"/> Buildings	<input type="checkbox"/> Land	<input type="checkbox"/> Pollution Control -Land Impro
<input type="checkbox"/> Computer Equipment	<input type="checkbox"/> Land Improvements	<input type="checkbox"/> Pollution Control -M & E
<input type="checkbox"/> Computer Software	<input type="checkbox"/> Leasehold Improvements	
<input type="checkbox"/> Furniture & Office Equipment	<input checked="" type="checkbox"/> Machinery & Equipment	

**Project Classification: (Check One)**

<input checked="" type="checkbox"/> 1. Cost Savings	<input type="checkbox"/> 3. Maintenance Replacement (Original Project No. _____)
<input type="checkbox"/> 2. New or Additional Facilities	<input type="checkbox"/> 4. Safety, Health, Environmental
	<input type="checkbox"/> 5. Other (Specify) _____

**1. Project Description:**  
SEE ATTACHED DETAILED DESCRIPTION DOCUMENTS

**2. Project Justification:** SEVERAL POSSIBLE CASES WERE EVALUATED RELATED TO DISPOSITION OF THE NEWARK - DOREMUS AVE. PLANT. TWO CASES INVOLVED LARGE WRITE-OFF AND ONE-TIME ENVIRONMENTAL CHARGES ( 11.3 MM\$ & 11.4 MM\$ ) WHICH WERE DETERMINED UNACCEPTABLE. THE OTHER OPTIONS INVOLVED EITHER OPERATING THE SITE AS A TERMINAL ONLY WITH NO PRODUCTION VERSUS REHABILITATION OF PRODUCTION FACILITIES TO RESUME PRODUCTION AND TERMINAL OPERATIONS. ATTACHED IS A COPY OF THE REVISED ECONOMIC EVALUATION OF THESE CASES AND A CASH FLOW ANALYSIS OF THE PRODUCTION REHABILITATION CASE REPRESENTED IN THIS CEAR.

**3. Benefits to Accrue to the Division/Corp.:**  
SEE ATTACHED DETAILED DESCRIPTION OF BENEFITS

REVIEW & APPROVALS			
	Signature	Date	
Div. Engineering	COPY		VP Functional
Safety & Health			Corp. Controller
Environmental			Corp. Mgmt. Comm.
Div. Controller			Corp. Mgmt. Comm.
VP Operations			Corp. Mgmt. Comm.
Div. President			Corp. Pres. & CEO

**CEAR NO.:** \_\_\_\_\_

# PROJECT BENEFITS

## NEWARK – DOREMUS AVE. PLANT REHABILITATION

- INCREASED SAFETY IN PRODUCTION OF SOLUTION ACRYLICS AND MONOMER MODIFIED PRODUCTS
- INCREASED SAFETY IN MONOMER AND INITIATOR HANDLING
- REDUCED PRODUCT CROSS CONTAMINATION POTENTIAL
- UPGRADE OF CONTROL SYSTEM TO "STATE-OF-THE-ART"
  - PROVIDES RESOURCES FOR:
    - INTERLOCKING SAFETY SYSTEMS
    - CLOSE BATCH SUPERVISION
    - IMPROVED BATCH CONTROL
    - IMPROVED BATCH CONSISTENCY/QUALITY
    - SUPERVISION OF TANK LEVELS PLANT WIDE
    - IMPROVED INVENTORY CONTROL
    - PROCESS SAFETY MANAGEMENT OF CHANGE
    - FORMULA MANAGEMENT
    - INCREASED AUTOMATION WHICH WILL REDUCE CURRENT MANPOWER REQUIREMENTS AND COST AND PROVIDE THE CONTROL CAPABILITY FOR ADDITIONAL INCREASED FUTURE AUTOMATION
    - REDUCTION OF ENVIRONMENTAL EMISSIONS
    - FUTURE INTEGRATION WITH ACCOUNTING SYSTEM
- CONTROL SYSTEM CAN BE RELOCATED IN THE FUTURE IF DESIRED
- CONTROL SYSTEM IS EASILY/ECONOMICALLY EXPANDABLE FOR FUTURE EXPANSION SUCH AS:
  - POWDER COATING RESIN PRODUCTION/PACKAGING
  - CONSOLIDATION OF NORTHEAST FACILITIES

## EXECUTIVE SUMMARY

On January 10, 1992 an explosion occurred in the Newark - Doremus Avenue plant. The purpose of this appropriation request is to provide capital funds for that portion of the repair/replacement cost which is considered to be a "betterment" over the pre-Jan. 10, 1992 facilities. The term "betterment" comes from Industrial Risk Insurers (IRI), our insurance carrier, and is loosely defined as anything which improves the facility functionally and is not a "replacement-in-kind". The majority of expense to repair the facility will be reimbursed by IRI as "replacement-in-kind" and functionally equivalent, however there are several areas/items which will be only partially reimbursible or totally non-reimbursible. Some of these areas/items are required by OSHA to re-start production of solution acrylic and monomer modified products. Other items are highly desirable due to expected high return in improved cost and/or safety. The control system is the largest single item. Due to the extensive damage to the existing control room instrumentation, it has been determined that repair/replacement in-kind would be difficult due to the majority of instruments being obsolete and repair parts unavailable or more expensive than new electronic instrumentation. In addition, replacement of many individual control panel instruments would be complicated with no appreciable benefits being derived, other than return to status-quo operations. By replacing the entire control panel with a Distributed Control System (DCS), the cost of the system will be largely borne by IRI with significant resulting benefits to Reichhold.

In July, 1992 an economic evaluation was prepared which resulted in a division management decision to proceed with repair of the Newark(D) production facilities. The economic evaluation included a capital cost of \$1,000,000 over and above the insurance reimbursement at Newark(D) and an additional \$1,840,000 of capital spending at other division locations for production replacement during the interim production period. These capital requirements have now been reduced to \$800,000 and \$1,505,000 respectively. A revised economic evaluation summary is included in this CEAR for reference.

Further detailed description of the project follows.



# FINANCIAL SUMMARY

This financial summary is based on the difference in annual cost produced primarily by the headcount reduction resulting from replacement of the old control room equipment with the new Distributed Control System. (Case III vs. Base Case)

Case III is the case provided for in this project. A full description of the cases is on the economic evaluation summary.

This CEAR has been classified as a Cost Savings project since there is a very large favorable financial impact, however the cost savings are really a partial benefit. Very significant benefits in the areas of safety, health, environmental and quality are also derived from this project.

CAPITAL REQUIRED:	<u>\$800,000</u>
NET PRESENT VALUE: @ 10.5% INVESTMENT RATE	<u>\$4,090,000</u>
INTERNAL RATE OF RETURN:	<u>96%</u>
PAYBACK PERIOD:	<u>1 YEAR</u>

# FINANCIAL SUMMARY

Attachment ii

Project Sponsor	R. P. ASTON	Date	JAN. 5, 1993	RFA No.	2492	CASE III w. BASB CASE
Location	013 - NEWARK (DOREBUS AVE.)					

**Project Title:** NEWARK - DOREBUS AVE. PLANT REHABILITATION

## BASIS

Total Project Cost:	\$800,000	Income Tax Rate (%):	0.0%
Composite Equipment Life:	10.0 Years	Investment Rate:	10.5%

## RESULTS

Internal Rate of Return:	95.9%	Net Present Value:	\$4,091,631	Payback Period	1.0 Years
--------------------------	-------	--------------------	-------------	----------------	-----------

	YEAR							
	1	2	3	4	5	6	7	8
Annual Sales in MM Pounds								
% of Designed Capacity								
Gross Sales								
Less: Freight-Out								
Net Sales				0	0	0	0	0
Operating Expenses								
Depreciation	80,000	80,000	80,000	80,000	80,000	80,000	80,000	80,000
Property Taxes & Insurance								
Apportioned Services								
Shipping & Warehousing								
Total Cost of Sales								
Gross Profit Improvement Over Base Case								
Less: Selling, Admin., R & D								
Operating Income								
Add: Annual Cost Savings (GROSS PROFIT IMPROVEMENT OVER BASB CASE)	853,660	853,660	853,660	853,660	853,660	853,660	853,660	853,660
Before Tax Income	853,660	853,660	853,660	853,660	853,660	853,660	853,660	853,660
Income Tax	0	0	0	0	0	0	0	0
After Tax Income	853,660	853,660	853,660	853,660	853,660	853,660	853,660	853,660
Cash Flow	933,660	933,660	933,660	933,660	933,660	933,660	933,660	933,660
Discount Factor	0.9050	0.8190	0.7412	0.6707	0.6070	0.5493	0.4971	0.4499
Present Value	844,962	764,668	692,029	626,206	566,732	512,859	464,122	420,054

## QUARTERLY EXPENDITURES Calendar Quarters Following CEAR Approval

Fixed Assets:	1st Q	2nd Q	3rd Q	4th Q	5th Q	6th Q	TOTAL
Automobiles & Trucks							\$0
Buildings	10000	10,000					\$20,000
Computer Equipment							\$0
Computer Software							\$0
Engineering	30000	30,000	10,000				\$70,000
Furniture/Office Equipment							\$0
Laboratory Equipment							\$0
Land							\$0
Land Improvements							\$0
Leasehold Improvements							\$0
Machinery & Equipment	450000	200,000	60,000				\$710,000
Pollution Control: Buildings							\$0
Pollution Control: Land Improvements							\$0
Pollution Control: Machinery & Equipment							\$0
<b>TOTAL</b>	<b>\$490,000</b>	<b>\$240,000</b>	<b>\$70,000</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$800,000</b>

Form AR2  
Rev. 6/92

# PROJECT DESCRIPTION

## DISTRIBUTED CONTROL SYSTEM (DCS):

The existing control room on the fourth floor will be converted to a terminal room which will house the instrument and electrical junctions from field instruments to the new distributed control system (DCS). The actual processors and signal conditioning hardware will also be housed in the existing control room area. The floor space required for this will be less than the old control panel so the shift supervisors office will also be relocated to the old control room area. The new control room which will house the operator consoles (graphic screens and keyboards), will be located in the office area adjacent to the fourth floor laboratory. Recipe management, batch charging and temperature controls for the various production grades produced at the site will be maintained by the distributed control system (DCS). Safety alarms and interlock requirements will be programmed to provide safe operations and shutdown when required. The existing controllers, and equipment start/stop controls will be replaced by the DCS. The control wiring or tubing for existing field devices will be connected to signal conditioning hardware which will integrate existing field instrumentation with the new DCS. The MicroXL DCS system has been selected due to previous project experience with Johnson Yokogawa hardware, batch flexibility, expansion capability, high reliability of system hardware, and competitive cost. Reichhold has obtained a 30% off of list price discount with Johnson Yokogawa due to the volume of purchases by other Reichhold and Dianippon locations worldwide. Control technique will be changed from simple closed single loop control to composite loop control to realize safer operations. Interlocks and safe responses will be pre-defined during programming and configuration to help prevent unsafe occurrences. The programming effort for the project will run concurrently with the re-construction of the Doremus plant, to enable meeting the desired start-up schedule. Production operations can be simulated and tested as field devices are connected to the control system hardware. This system will greatly enhance operator training efforts as well. Personnel savings will result from reduced manual operations such as sticking tanks for determining inventories, remote operation of many frequently operated valves, and increased automation of some production activities, initially with the R-4 amino resin system and wastewater stripping. All vents will be monitored by the DCS and alarm and/or take action such as reduce reactor heating or cooling rates if high temperatures are detected, thus reducing environmental excursions and material losses. Other activities such as automation of reactor liquid charging will be enabled in the future by addition of remote valve actuators and additional field instruments. The control system will be easily and

economically expandable.

#### OSHA REQUIRED SAFETY SYSTEMS

Inhibitor solution emergency systems (2) will be installed which are designed to stop a potential runaway polymerization of monomer in reactors R-1,2,3 & 5 as well as the two monomer charging tanks T-119 and T-124. These systems will be controlled by the DCS and actuate upon exceeding a safe rate-of-rise in temperature, or upon exceeding a safe high temperature for a given monomer. These systems can also be manually activated, and will be operational during a power outage via back-up utilities.

Initiator feed systems (2) will be installed to feed polymerization initiator solution directly to the reactors. The feed will be interlocked to feed at a given ratio, simultaneously to but independently from monomer feed. These feed systems and integral safety systems will be controlled by the DCS. The previous practice of premixing monomer and initiator will be eliminated.

High temperature monitoring, alarms, and automatic safety actions will be provided for all reactors and monomer tanks. High pressure monitoring, alarms and automatic safety actions will be provided for same. All emergency relief vents from reactors, thin tanks, and various other equipment will vent to an existing 8,000 gallon containment vessel on the fifth floor, prior to venting to the atmosphere above the roof.

#### REDUCTION OF CROSS-CONTAMINATION:

Spinner wash nozzles will be installed in all reactors to enable more efficient washing of reactors between incompatible batches.

#### OPERATING EFFICIENCY:

Decanter interface level instrumentation will be installed to automate decanter control. The DCS will control these levels. This will also enable automatic action to reduce water reflux to the reactors thus reducing foamover potential. Actions will include alarms, reducing heat, closing reflux valves, etc. Reactor pressure will be programmed to take similar action.

Remote operation of wet alcohol storage tanks will greatly reduce manual requirements.

Remote automatic level gaging of all bulk storage tanks in the plant. The level transmitters have been provided by another project (DPCC Spill Prevention). The transmitters will be interfaced with the DCS which will record, alarm, and provide inventory monitoring for all bulk materials in the plant. The use of the DCS for this purpose reduced the capital requirement on the DPCC project by \$60,000. The DPCC tank level monitoring is

required by regulation.

**ADDITIONAL PROCESS IMPROVEMENTS:**

R-3 reactor will be modified to enable production of copolymers.

Current monitoring instruments will be installed on reactor agitators and connected to the DCS which will monitor the agitator operation and alarm if the agitator stops, as well as monitor whether the agitator is at the proper speed setting for a given formula.

Large existing storage tanks will be converted to wet alcohol storage and amino wastewater storage. This will enable operation of the amino system with either on-line or off-line alcohol recovery. The amino process will be operated refluxing wet alcohol to the reactor rather than anhydrous alcohol. Off-line recovery will give us the ability to more efficiently operate in this mode. Refluxing wet alcohol has proven to produce more consistent product as is currently being experienced at Staflex Inc. (toll producer). The wastewater tank will enable separation of amino wastewater from other plant wastewater and in turn eliminate amino wastewater from treatment via the OCPSF stripper. The amino wastewater is not OCPSF regulated and has sometimes interfered with OCPSF treatment.

# SAFETY HEALTH & ENVIRONMENTAL STATEMENT

## GENERAL

This project as well as the general repair/replacement of damaged facilities at Newark(D) will provide many improvements in the areas of safety, health, and environmental. The entire fifth floors of Buildings 31 & 32 will be repaired to current building standards and electrical standards, BOCA & NEC, and to City of Newark building standards which in some cases are more stringent. This is also true of some areas on the other floors of the building, particularly where electrical and structural damage is being repaired. These additional costs are included within the IRI reimbursed portion of the repair work. The windows throughout the entire Buildings 31/32 are being replaced with tempered glass, and will have explosion venting type fasteners and tethers. In addition to the windows, the fifth floor of Building 31 will have an approximately equal area of explosion relief wall and roof panels to meet the BOCA code. Sprinkler replacements are designed to IRI recommendations and BOCA code, and have been reviewed and approved by IRI and the City of Newark. This is also true of general building structural and electrical repairs.

The solution acrylic related reactors, and monomer charging systems have been designed to meet OSHA requirements and will be thoroughly reviewed and approved by OSHA regional personnel prior to installation & start-up. There are many safety improvements which will be programmed into the DCS at minimal cost which is one of the many benefits of the control system.

## PROCESS HAZARD ANALYSIS

All Piping & Instrument Diagrams will undergo a "What-If/Checklist" type Process Hazard Analysis (PHA) prior to the construction phase and any issues identified will be addressed prior to start-up. The PHA team will consist of plant salaried and hourly personnel, division and corporate engineering, safety and health personnel.

## PERSONNEL TRAINING & PROCESS SAFETY

Plant salaried and hourly personnel will be trained prior to start-up of the facility. Full operating procedures, and general standard procedures will be reviewed, and revised or written as necessary to ensure that the plant is compliant with regulations and plant personnel are adequately trained for safe operation prior to start-up.

#### AIR PERMITTING

In general all grandfathered air permits existing in the facility will be maintained intact as much as possible, as there are no significant changes in planned production or emissions. A permit application to produce amino resins in R-3 reactor had previously been submitted to the NJDEP, and returned un-approved due to lack of complete information. There are no current plans to re-submit this application as no plans or capability exists to produce aminos in R-3. R-3 is grandfathered to produce copolymers, and high temperature alkyds/polyesters. R-4 amino resin reactor permit was revoked by the State in March, 1992 due to failure to perform the stack test which was planned in late January, 1992. This has been discussed with the NJDEP and we have been advised that we must notify them in writing of our desire to re-start production in this equipment and re-schedule the stack test, to reinstate the temporary permit. The stack test was required by NJDEP due to the high peak emissions during the methylated amino vacuum stripping. We will request that the stack test requirement be dropped due to the fact that we now have no plans to produce methylated aminos and the next worst case emission (iso-butylated resin) has 20% - 25% of the emission rate of the methylated production. We are hopeful the requirement will be dropped, but there is no guarantee. There are no changes or issues with the other reactors.

There is a question of whether we are in compliance with emission regulations on the thin tanks which do not have vent condensers. These emissions have never been actually calculated, but assumed in the past to be in compliance. During our review this question surfaced, so calculations will be made to verify the issue. We believe we can maintain our grandfathered status by controlling the procedure of charging the thin tanks. This may require additional cooling time and thinning in the reactor during the transfer of polymers to the thin tanks. This condition has existed previously and is not related to this project, however procedures will be modified prior to start up to ensure environmental compliance. If the production efficiency is reduced significantly, this will be addressed by a separate future project.

Several storage tanks will change service and existing air permits are being modified. During our review it was discovered that several other storage tank permits were allowed to expire in late 1991. These tanks must be re-permitted and these applications are now being prepared for re-submission in late January, 1993.

The solids charging chutes on the fifth floor will all be converted to the bag filter type, with venting manifolded to 2 vents rather than 5 separate vents. Emissions of dry particulate materials onto the roof will be essentially eliminated. Permits for these devices and new vents are being prepared for submission to the NJDEP by early February, 1993.

# REICHHOLD CHEMICALS, INC.

## CEAR LINE ITEM DETAIL COST ESTIMATE

Attachment iii

Project Title: NEWARK (D) PLANT REHABILITATION

RFA No: 2492

Newark - Doremus Ave. Plant    Location - 013

Date: 01/07/93

Item No.	Item Description	Total Asset	Piping	Electrical & Instrument	Insulation	Civil	Sales Tax	Freight	Estimated IRI Reimbursement	Total RCI Capital
1	INITIATOR FEED SYSTEMS	105,000	Included	Included	Included	Included	Included	Included	(79,000)	\$26,000
2	KILL SOLUTION TANKS	110,000	Included	Included	Included	Included	Included	Included	0	\$110,000
3	SPINNER WASH SYSTEMS	12,000	Included	Included	Included	Included	Included	Included	0	\$12,000
4	DECANTER LEVEL LOOPS	26,000	Included	Included	Included	Included	Included	Included	0	\$26,000
5	AGITATOR FAILURE INSTRUMENTATION	6,000	Included	Included	Included	Included	Included	Included	0	\$6,000
6	REACTOR BOTTOM VALVE ACTUATION	23,000	Included	Included	Included	Included	Included	Included	0	\$23,000
7	WET ALCOHOL STORAGE	65,000	Included	Included	Included	Included	Included	Included	0	\$65,000
8	AMINO WASTEWATER STORAGE	38,000	Included	Included	Included	Included	Included	Included	0	\$38,000
9	MODIFY R-3 TO PRODUCE COPOLYMERS	14,000	Included	Included	Included	Included	Included	Included	0	\$14,000
10	R-4 REMOTE WET ALCOHOL ACTUATION	35,000	Included	Included	Included	Included	Included	Included	0	\$35,000
11	PRESSURE ALARMS ON MONOMER TANKS	4,000	Included	Included	Included	Included	Included	Included	0	\$4,000
12	AUTO CITY WATER COOLING ON T-124	5,000	Included	Included	Included	Included	Included	Included	0	\$5,000
13	T-77 CATCH TANK FOR RELIEF VENTS	72,000	Included	Included	Included	Included	Included	Included	(36,000)	\$36,000
14	YOKOGAWA CONTROL SYSTEM	500,000		Included	Included	Included	Included	Included	(250,000)	\$250,000
15	PROGRAMMING OF CONTROL SYSTEM	100,000			Included		Included		(50,000)	\$50,000
(All materials, labor, freight & taxes are included above.)										
<b>Subtotal</b>										<b>\$700,000</b>
<b>Contingency For Items Disputed With IRI</b>										<b>\$100,000</b>
<b>TOTAL</b>										
<b>Expenses associated with CEAR (includes training and other start-up costs)</b>										<b>Included</b>
<b>Working Capital (e.g., inventory requirements)</b>										<b>\$0</b>
<b>GRAND TOTAL</b>										<b>\$800,000</b>
<b>Comments:</b> Instrumentation based on actual proposals. Balance based on joint engineering estimate by O'Brien & Gere and R.P. Aston.						<b>Estimated By:</b>  <u>R.P. ASTON/C. HARTSHORN/OB&amp;G</u>				



## NEWARK(D) EVALUATION – PROJECT ALTERNATIVES CASE DESCRIPTIONS

BASE CASE – RESTORE NEWARK(D) AND ALL OTHER OPERATIONS TO PRE – JAN. 10, 1992 CONDITIONS

CASE I – CLOSE ALL OPERATIONS AT NEWARK(D); CLEAN-UP SITE, COMPLETE ECRA, SELL PROPERTY

CASE II – CONTINUE TERMINAL OPERATIONS FOR PRODUCT & RAW MATERIAL SUPPORT FOR NWK(A)  
NO PRODUCTION; DRUM SOME PRODUCT FROM BULK

CASE III – PRODUCE AMINOS, COPOLYMERS, KELSOLS, ACRYLICS AND HIGH TEMP INTERMEDIATES IN NWK(D)  
TRANSFER CONVENTIONAL ALKYDS TO NEWARK(A)  
CONTINUE TERMINAL OPERATIONS FOR PRODUCT & RAW MATERIAL SUPPORT FOR NWK(A)  
FULL DRUMMING CAPABILITY OF PRODUCTION & DRUM SOME PRODUCT FROM BULK

CASE IV – FULL PRODUCTION FACILITY TO INCORPORATE NWK(A)

# NEWARK – DOREMUS AVE. ECONOMIC EVALUATION – REVISED

COATING POLYMERS & RESINS DIVISION

(JANUARY 7, 1993)

**BASE CASE – RESTORE NEWARK(D) AND ALL OTHER OPERATIONS TO PRE – JAN. 10, 1992 CONDITIONS**

**CASE I – CLOSE ALL OPERATIONS AT NEWARK(D); CLEAN-UP SITE, COMPLETE ECRA, SELL PROPERTY**

**CASE II – CONTINUE TERMINAL OPERATIONS FOR PRODUCT & RAW MATERIAL SUPPORT FOR NWK(A)  
NO PRODUCTION; DRUM SOME PRODUCT FROM BULK**

**CASE III – PRODUCE AMINOS, COPOLYMERS, KELSOLS ACRYLICS AND HIGH TEMP INTERMEDIATES IN NWK(D).  
TRANSFER CONVENTIONAL ALKYDS TO NWK(A).  
CONTINUE TERMINAL OPERATIONS FOR PRODUCT & RAW MATERIAL SUPPORT FOR NWK(A).  
FULL DRUMMING CAPABILITY OF PRODUCTION & DRUM SOME PRODUCT FROM BULK**

**CASE IV – FULL PRODUCTION FACILITY TO INCORPORATE NWK(A)**

	BASE CASE	CASE I	CASE II	CASE III	CASE IV
A NET BOOK VALUE	10,029,000	10,029,000	10,029,000	10,029,000	1,418,000
B ESTIMATED PROPERTY VALUE	NA	2,700,000	NA	NA	500,000
C DEMOLITION COST	320,000	20,000	300,000	320,000	1,000,000
D SALVAGE VALUE	NA	840,000	0	NA	200,000
<b>COSTS ASSOCIATED WITH ECRA COMPLIANCE</b>					
E RECORD SEARCH	NA	30,000	30,000	NA	30,000
F INITIAL ECRA ACTIVITIES	NA	75,000	75,000	NA	75,000
G SAMPLING COST	NA	450,000	450,000	NA	600,000
H DECOMMISSIONING	NA	750,000	400,000	NA	500,000
I ASBESTOS REMOVAL	NA	150,000	150,000	NA	100,000
J UNDERGROUND STORAGE TANKS	NA	75,000	75,000	NA	100,000
K SOIL CLEANUP	NA	1,500,000	1,500,000	NA	4,000,000
L GROUNDWATER REMEDIATION	NA	150,000	150,000	NA	4,000,000
M SECURITY COST	NA	240,000	0	NA	240,000
N PROPERTY MANAGEMENT COST	NA	100,000	10,000	NA	100,000
O UTILITY COST	NA	200,000	50,000	NA	200,000
P TOTAL ECRA	0	3,720,000	2,860,000	0	9,945,000
Q INSURANCE SETTLEMENT ACV	NA	2,500,000	2,400,000	NA	NA
R REPAIR/REPLACEMENT COST (RR)	7,500,000	2,500,000	2,500,000	7,500,000	7,500,000
S ASSET WRITE OFF (+A-Q)	NA	7,529,000	0	0	1,418,000
T NEW NWK(D) NET BOOK VALUE (+A-Q-S+U)	10,429,000	0	7,729,000	10,829,000	17,029,000
<b>ADDITIONAL CAPITAL REQUIREMENTS</b>					
U NEWARK(D)	400,000	NA	100,000	800,000	7,000,000
V NEWARK(A)	0	2,700,000	0	0	NA
W PENSACOLA	500,000	500,000	500,000	500,000	500,000
X VALLEY PARK	130,000	130,000	130,000	130,000	130,000
Y BRIDGEVILLE	500,000	4,000,000	4,000,000	500,000	500,000
Z BALTIMORE	0	0	0	0	0
AA OTHER (CHI WEST ETC)	375,000	375,000	375,000	375,000	375,000
AB TOTAL ADDITIONAL CAPITAL REQUIRED	1,905,000	7,705,000	5,105,000	2,305,000	8,505,000
<b>PRODUCTION REPLACEMENT COSTS IN OTHER LOCATIONS</b>					
AC NEWARK(A) \$/YR INCR.	0	430,000	180,000	180,000	(4,429,000)
AD PENSACOLA \$/YR INCR.	50,000	155,000	155,000	50,000	185,000
AE VALLEY PARK \$/YR INCR.	13,000	13,000	13,000	13,000	13,000
AF MINNEAPOLIS \$/YR INCR.	0	100,000	100,000	0	0
AG BRIDGEVILLE \$/YR INCR.	0	1,820,000	1,820,000	0	0
AH BALTIMORE \$/YR INCR.	0	20,000	20,000	0	0
AI CHICAGO \$/YR INCR.	0	837,500	837,500	0	837,500
AJ OTHER \$/YR INCR.	NA	NA	NA	NA	NA
AK TOTAL PROD. REPLACEMENT COSTS	63,000	3,375,500	3,105,500	223,000	(3,363,500)
<b>NEWARK(D) MANUFACTURING COSTS</b>					
AL WAGES, SALARIES & BENEFITS	2,822,000	0	323,000	2,141,500	3,422,550
AM TAXES & INSURANCE	248,852	0	248,852	248,852	275,000
AN DEPRECIATION	917,524	0	650,000	960,000	1,600,000
AO UTILITIES	640,000	0	277,500	531,000	842,500
AP OTHER OPERATING COSTS	1,149,136	0	315,500	882,500	1,776,700
AQ TOTAL NEWARK(D) MANUFG. COSTS	5,775,512	0	1,812,852	4,761,852	7,918,750
AR PRODUCTION VOLUME (LBS/YR NWK(D))	44,000,000	0	0	36,000,000	84,000,000
AS GROSS SALES	29,133,100	29,133,100	29,133,100	29,133,100	29,133,100
AT FREIGHT COSTS	1,170,000	1,950,000	1,950,000	1,170,000	1,170,000
AU RAW MATERIAL COSTS	18,917,200	18,917,200	18,917,200	18,917,200	18,917,200
AV GROSS PROFIT 1ST YR (+AS-AT-AU-AQ-C+B+D-P-S-AK)	4,887,388	(1,038,600)	2,157,548	5,741,048	(5,148,350)
AW GROSS PROFIT ONGOING (+AS-AT-AU-AQ-AK)	5,207,388	6,890,400	5,347,548	6,061,048	6,512,850
AX NET CASH OUTLAY (+C+P+AB-B-D-Q)	2,225,000	5,605,000	5,895,000	2,625,000	18,750,000

## NEWARK(D) EVALUATION - CASE DESCRIPTIONS & ASSUMPTIONS

### BASE CASE - RESTORE NEWARK(D) AND ALL OTHER OPERATIONS TO PRE - JAN. 10, 1992 CONDITIONS

- \* ECRA is NOT triggered.
- \* Continued production operations, Bldgs 16 and other smaller bldgs will be cleaned-up/demolished. Bldg 12 NOT demolished at this time  
Bldg 12 will be oversprayed with some type of weatherproof fixative.
- \* Bldgs 31/32 to be completely repaired to pre Jan. 10 condition with reimbursement by IRI.
- \* Bare minimum additional capital over & above IRI repair/replace is required to remediate OSHA & EPA issues only.
- \* Capital already spent on Pensacola, Valley Park, Chicago & Bridgeville is 100% recovered from IRI.
- \* All products previously produced at Newark(D) prior to Jan. 10 to be produced again at Nwk(D).

### CASE I - CLOSE ALL OPERATIONS AT NEWARK(D); CLEAN-UP SITE, COMPLETE ECRA, SELL PROPERTY

- \* ECRA IS triggered.
- \* For ECRA and/or sale of property at Doremus, minimum demolition of only Bldgs which are falling down will be done.  
Bldg 12 will be oversprayed with some type of weatherproof fixative.
- \* Bldgs 31/32 repaired to minimum weather tight condition via IRI reimbursement for purpose of sale.
- \* Storage tanks, piping, and process equipment to be cleaned & decommissioned but not demolished.
- \* Capital already spent on Pensacola, Valley Park, Chicago & Bridgeville is 100% recovered from IRI.
- \* RCI to accept an ACV settlement from IRI on the mechanical & equipment damage which is not repaired.
- \* Wastewater stripper to be relocated to Newark - Albert plant site.
- \* Rail unloading for molten PA & new large PA tank to be installed @ Nwk(A).
- \* Ten product storage tanks to be added to Nwk(A).

### CASE II - CONTINUE TERMINAL OPERATIONS FOR PRODUCT & RAW MATERIAL SUPPORT FOR NWK(A) NO PRODUCTION; DRUM SOME PRODUCT FROM BULK

- \* ECRA IS triggered.
- \* For ECRA and/or minimum use of property at Doremus for terminal operations, minimum demolition of only Bldgs which are falling down will be done. Bldg 12 will be oversprayed with some type of weatherproof fixative.
- \* Bldgs 31/32 repaired to minimum weather tight condition via IRI reimbursement for purpose of future sale.
- \* Unutilized storage tanks, piping, and process equipment to be cleaned & decommissioned but not demolished.
- \* Capital already spent on Pensacola, Valley Park, Chicago & Bridgeville is 100% recovered from IRI.
- \* RCI to accept an ACV settlement from IRI on the mechanical & equipment damage which is not repaired.
- \* Wastewater stripper to be operated to support Newark - Albert plant.
- \* Molten PA, and other raw material storage tanks to be utilized to support Newark(A).
- \* Product storage tanks to be utilized to support Newark(A).

## NEWARK(D) EVALUATION –CASE DESCRIPTIONS & ASSUMPTIONS

**CASE III – PRODUCE AMINOS, COPOLYMERS, KELSOLS, ACRYLICS AND HIGH TEMP INTERMEDIATES IN NWK(D)  
TRANSFER CONVENTIONAL ALKYDS TO NWK(A).  
CONTINUE TERMINAL OPERATIONS FOR PRODUCT & RAW MATERIAL SUPPORT FOR NWK(A)  
FULL DRUMMING CAPABILITY OF PRODUCTION & DRUM SOME PRODUCT FROM BULK**

- \* ECRA is NOT triggered.
- \* Continued production operations, Bldgs 16 and other smaller bldgs will be cleaned-up/demolished. Bldg 12 NOT demolished at this time  
Bldg 12 will be oversprayed with some type of weatherproof fixative.
- \* Bare minimum additional capital over & above IRI repair/replace is required to remediate OSHA & EPA issues, PLUS control system upgrac
- \* Capital already spent on Pensacola, Valley Park, Chicago & Bridgeville is 100% recovered from IRI.
- \* Bldgs 31/32 to be completely repaired to pre Jan. 10 condition with reimbursement by IRI.
- \* Wastewater stripper to be operated to support Newark – Albert plant.
- \* Molten PA, and other raw material storage tanks to be utilized to support Newark(A).
- \* Product storage tanks to be utilized to support Newark(A).

**CASE IV – FULL PRODUCTION FACILITY TO INCORPORATE NWK(A)**

- \* ECRA is NOT triggered at Nwk(D) but ECRA IS triggered at Nwk(A).
- \* For expanded production operations at Doremus, Bldgs 12 and other smaller bldgs must be cleaned-up/demolished.
- \* Bldgs 31/32 to be completely repaired to pre Jan. 10 condition with reimbursement by IRI.
- \* Additional capital over & above IRI repair/replace is required to remediate OSHA & EPA issues and to  
expand production capacity to enable Newark(A) production and trucking to be incorporated into Newark(D).
- \* Capital already spent on Pensacola, Valley Park, Chicago & Bridgeville is 100% recovered from IRI.
- \* Newark – Albert Ave. plant to be closed, cleaned-up, and property sold.
- \* Newark(A) production to be transferred permanently to Newark(D), Chicago & Pensacola.

## NEWARK(D) EVALUATION – PROPERTY VALUE

### BASE CASE – RESTORE NEWARK(D) AND ALL OTHER OPERATIONS TO PRE – JAN. 10, 1992 CONDITIONS

No Property Value Issues

### CASE I – CLOSE ALL OPERATIONS AT NEWARK(D); CLEAN-UP SITE, COMPLETE ECRA, SELL PROPERTY

Gross value of Doremus Avenue	4,000,000
Less Demolition Expense*	(1,100,000)
Less Selling Expense	(200,000)
Net Value of Sale	2,700,000

\*This has been subtracted since it was deferred from the demolition cost and is assumed to reduce the value to any potential future use of the property.

### CASE II – CONTINUE TERMINAL OPERATIONS FOR PRODUCT & RAW MATERIAL SUPPORT FOR NWK(A) NO PRODUCTION; DRUM SOME PRODUCT FROM BULK

No Property Value Issues

### CASE III – PRODUCE AMINO RESINS, COPOLYMERS AND KELSOLS IN NEWARK(D). CONTINUE TERMINAL TRANSFER CONVENTIONAL ALKYDS TO NWK(A). OPERATIONS FOR PRODUCT & RAW MATERIAL SUPPORT FOR NWK(A) FULL DRUMMING CAPABILITY OF PRODUCTION & DRUM SOME PRODUCT FROM BULK

No Property Value Issues

### CASE IV – FULL PRODUCTION FACILITY TO INCORPORATE NWK(A)

Gross value of Albert Avenue	1,000,000
Less Demolition Expense*	(300,000)
Less Selling Expense	(200,000)
Net Value of Sale	500,000

\*This has been subtracted since it was deferred from the demolition cost and is assumed to reduce the value to any potential future use of the property.

## NEWARK(D) EVALUATION – DEMOLITION COST

### BASE CASE – RESTORE NEWARK(D) AND ALL OTHER OPERATIONS TO PRE – JAN. 10, 1992 CONDITIONS

* Bldg 12 – Encapsulate	90,000	* \$20,000 for maintenance storage shed already committed.
* Bldg 16 – Demolish	150,000	
* Maintenance Storage Shed – Demolish	20,000 *	
* Other Miscellaneous Demolition	60,000	
<b>TOTAL</b>	<b>320,000</b>	

### CASE I – CLOSE ALL OPERATIONS AT NEWARK(D); CLEAN-UP SITE, COMPLETE ECRA, SELL PROPERTY

* Bldg 12 – Encapsulate	770,000	* \$20,000 for maintenance storage shed already committed.
* Bldg 16 – Demolish	150,000	
* Maintenance Storage Shed – Demolish	20,000 *	
* Other Miscellaneous Demolition	180,000	
<b>TOTAL</b>	<b>1,120,000</b>	

### CASE II – CONTINUE TERMINAL OPERATIONS FOR PRODUCT & RAW MATERIAL SUPPORT FOR NWK(A) NO PRODUCTION; DRUM SOME PRODUCT FROM BULK

* Bldg 12 – Encapsulate	90,000	* \$20,000 for maintenance storage shed already committed.
* Bldg 16 – Demolish	150,000	
* Maintenance Storage Shed – Demolish	20,000 *	
* Other Miscellaneous Demolition	40,000	
<b>TOTAL</b>	<b>300,000</b>	

### CASE III – PRODUCE AMINOS, COPOLYMERS, KELSOLS, ACRYLICS AND HIGH TEMP INTERMEDIATES IN NWK(D). TRANSFER CONVENTIONAL ALKYDS TO NWK(A). CONTINUE TERMINAL OPERATIONS FOR PRODUCT & RAW MATERIAL SUPPORT FOR NWK(A) FULL DRUMMING CAPABILITY OF PRODUCTION & DRUM SOME PRODUCT FROM BULK

* Bldg 12 – Encapsulate	90,000	* \$20,000 for maintenance storage shed already committed.
* Bldg 16 – Demolish	150,000	
* Maintenance Storage Shed – Demolish	20,000 *	
* Other Miscellaneous Demolition	60,000	
<b>TOTAL</b>	<b>320,000</b>	

### CASE IV – FULL PRODUCTION FACILITY TO INCORPORATE NWK(A)

* Bldg 12 – Demolish	770,000	* \$20,000 for maintenance storage shed already committed.
* Bldg 16 – Demolish	150,000	
* Maintenance Storage Shed – Demolish	20,000 *	
* Other Miscellaneous Demolition	60,000	

## NEWARK(D) EVALUATION - SALVAGE VALUE

## BASE CASE - RESTORE NEWARK(D) AND ALL OTHER OPERATIONS TO PRE - JAN. 10, 1992 CONDITIONS

No Salvage Value

## CASE I - CLOSE ALL OPERATIONS AT NEWARK(D); CLEAN-UP SITE, COMPLETE ECRA, SELL PROPERTY

	Value	- Removal	Net Value
Gross value of Doremus Avenue Equipment			
Reactors	125,000	(50,000)	75,000
Overheads	80,000	(20,000)	60,000
Agitators	125,000	(50,000)	75,000
Pumps	50,000	(25,000)	25,000
Boilers	100,000	(50,000)	50,000
Tanks	200,000	(100,000)	100,000
Filters	75,000	(15,000)	60,000
Pipe, valves & fittings	100,000	(50,000)	50,000
Electrical & Instrument	100,000	(50,000)	50,000
Office Equipment	20,000	0	20,000
Other	100,000	(25,000)	75,000
Net Value of Salvaged Equipment	1,075,000	(435,000)	640,000

CASE II - CONTINUE TERMINAL OPERATIONS FOR PRODUCT & RAW MATERIAL SUPPORT FOR NWK(A)  
NO PRODUCTION; DRUM SOME PRODUCT FROM BULK

No Salvage Value - Unused Equipment mothballed

CASE III - PRODUCE AMINOS, COPOLYMERS, KELSOLS, ACRYLICS AND HIGH TEMP INTERMEDIATES IN NWK(D)  
TRANSFER CONVENTIONAL ALKYDS TO NWK(A).  
CONTINUE TERMINAL OPERATIONS FOR PRODUCT & RAW MATERIAL SUPPORT FOR NWK(A)  
FULL DRUMMING CAPABILITY OF PRODUCTION & DRUM SOME PRODUCT FROM BULK

No Salvage Value - Unused Equipment mothballed

## CASE IV - FULL PRODUCTION FACILITY TO INCORPORATE NWK(A)

	Value	- Removal	Net Value
Gross value of Albert Avenue Equipment			
Reactors	40,000	(20,000)	20,000
Overheads	20,000	(10,000)	10,000
Agitators	25,000	(10,000)	15,000
Pumps	20,000	(10,000)	10,000
Boilers	75,000	(15,000)	60,000
Tanks	50,000	(30,000)	20,000
Filters	40,000	(10,000)	30,000
Pipe, valves & fittings	30,000	(20,000)	10,000
Electrical & Instrument	0	0	0
Office Equipment	20,000	(5,000)	15,000
Other	20,000	(10,000)	10,000
Net Value of Salvaged Equipment	340,000	(140,000)	200,000

# NEWARK(D) EVALUATION – COST OF ECRA COMPLIANCE

	BASE CASE	CASE I	CASE II	CASE III	CASE IV
RECORD SEARCH		30,000	30,000		30,000
INITIAL ECRA ACTIVITIES		75,000	75,000		75,000
SAMPLING COST		450,000	450,000		600,000
DECOMMISSIONING		750,000	400,000		500,000
ASBESTOS REMOVAL		150,000	150,000		100,000
UNDERGROUND STORAGE TANKS		75,000	75,000		100,000
SOIL CLEANUP		1,500,000	1,500,000		4,000,000
GROUNDWATER REMEDIATION		150,000	150,000		4,000,000
SECURITY COST		240,000	0		240,000
PROPERTY MANAGEMENT COST		100,000	10,000		100,000
UTILITY COSTS		200,000	50,000		200,000
<b>TOTAL ECRA COSTS – HIGH</b>	<b>0</b>	<b>3,720,000</b>	<b>2,890,000</b>	<b>0</b>	<b>9,945,000</b>
<b>TOTAL ECRA COSTS – LOW</b>	<b>0</b>	<b>2,720,000</b>	<b>1,890,000</b>	<b>0</b>	<b>5,945,000</b>



## NEWARK(D) EVALUATION — ADDITIONAL CAPITAL REQUIRED

	BASE CASE	CASE I	CASE II	CASE III	CASE IV
<b>NEWARK(D):</b>					
PROCESS UPGRADES (OSHA/EPA RELATED)	400,000		100,000	400,000	400,000
PROCESS CONTROL UPGRADE				400,000	400,000
4 REACTORS					1,850,000
4 TOTAL CONDENSERS					500,000
2 PACKED COLUMNS					300,000
2 PARTIAL CONDENSERS					125,000
8 THIN TANKS					2,800,000
4 FILTERS					200,000
1 T/W LOADING PLATFORM					200,000
2 T/W UNLOADING PLATFORMS					225,000
<b>TOTAL NEWARK(D)</b>	<b>400,000</b>	<b>0</b>	<b>100,000</b>	<b>800,000</b>	<b>7,000,000</b>
<b>NEWARK(A):</b>					
RELOCATE WW STRIPPER		500,000			
30 MGAL MOLTEN PA TANK & UNLOADING		400,000			
TEN PRODUCT STORAGE TANKS		1,800,000			
<b>TOTAL NEWARK(A)</b>	<b>0</b>	<b>2,700,000</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>PENSACOLA:</b>					
COPOLYMER IMPROVEMENTS	500,000	500,000	500,000	500,000	500,000
<b>VALLEY PARK:</b>					
KELSOL IMPROVEMENTS	130,000	130,000	130,000	130,000	130,000
<b>BRIDGEVILLE:</b>					
COPOLYMER SYSTEM	500,000	500,000	500,000	500,000	500,000
AMINO SYSTEM	0	3,500,000	3,500,000	0	0
<b>TOTAL BRIDGEVILLE</b>	<b>500,000</b>	<b>4,000,000</b>	<b>4,000,000</b>	<b>500,000</b>	<b>500,000</b>
<b>CHICAGO:</b>					
VARIOUS RE-START RELATED PROJECTS	375,000	375,000	375,000	375,000	375,000
<b>TOTAL ADDITIONAL CAPITAL REQUIRED</b>	<b>1,905,000</b>	<b>7,705,000</b>	<b>5,105,000</b>	<b>2,305,000</b>	<b>8,505,000</b>

# NEWARK(D) EVALUATION – PRODUCTION REPLACEMENT COSTS

	BASE CASE	CASE I	CASE II	CASE III	CASE IV
<b>NEWARK(A):</b>					
DEPRECIATION ON PLANT UPGRADE		270,000			
INCREMENTAL ALKYDS @ .02/LB		160,000	160,000	160,000	
TOTAL OPERATING BUDGET					(4,429,000)
<b>TOTAL NEWARK(A)</b>	0	430,000	160,000	160,000	(4,429,000)
<b>PENSACOLA:</b>					
DEPRECIATION ON COPOLYMERS UPGRADE	50,000	50,000	50,000	50,000	50,000
INCREMENTAL PRODUCTION @ .02/LB		(180,000)	(180,000)		100,000
ADDITIONAL EMPLOYEES		270,000	270,000		45,000
MISC. SUPPLIES		15,000	15,000		
<b>TOTAL PENSACOLA</b>	50,000	155,000	155,000	50,000	195,000
<b>VALLEY PARK:</b>					
DEPRECIATION ON KELSOL UPGRADE	13,000	13,000	13,000	13,000	13,000
INCREMENTAL PRODUCTION @ .02/LB	13,000	13,000	13,000	13,000	13,000
<b>TOTAL VALLEY PARK</b>	13,000	13,000	13,000	13,000	13,000
<b>MINNEAPOLIS:</b>					
INCREMENTAL INTERMEDIATES @ .02/LB	0	100,000	100,000	0	0
<b>BRIDGEVILLE:</b>					
DEPRECIATION	IDLE	(INCL BELOW)	(INCL BELOW)	IDLE	IDLE
11 MMLBS/YR COPOLYMERS @ .07/LB		770,000	770,000		
10 MMLBS/YR AMINOS @ .105/LB		1,050,000	1,050,000		
<b>TOTAL BRIDGEVILLE</b>	0	1,820,000	1,820,000	0	0
<b>BALTIMORE:</b>					
INCREMENTAL KELSOLS @ .02/LB	0	20,000	20,000	0	0
<b>CHICAGO:</b>					
DEPRECIATION ON RE-START PROJECTS	IDLE	37,500	37,500	IDLE	37,500
INCREMENTAL PRODUCTION @ .04/LB	0	800,000	800,000	0	800,000
<b>TOTAL CHICAGO</b>	0	837,500	837,500	0	837,500
<b>TOTAL PRODUCTION REPLACE COSTS</b>	63,000	3,375,500	3,105,500	223,000	(3,383,500)

## NEWARK - DOREMUS AVE. EVALUATION - OPERATING COSTS

	1992 ORIGINAL	BASE CASE	CASE II LOW	CASE II HIGH	CASE III LOW	CASE III HIGH	CASE IV LOW	CASE IV HIGH
TOTAL EMPLOYEES	70	66	7	9	45	53	68	80
AVERAGE W,S & B PER EMPLOYEE	42,714	42,758	40,857	40,000	42,778	44,491	46,043	46,428
WAGES, SALARIES & BENEFITS	2,990,000	2,822,000	286,000	360,000	1,925,000	2,358,000	3,130,900	3,714,200
UTILITIES								
GAS & OIL	424,824	262,000	80,000	90,000	195,000	220,000	390,000	410,000
ELECTRICITY	306,000	306,000	120,000	140,000	240,000	265,000	350,000	370,000
WATER & SEWER	72,000	72,000	60,000	85,000	70,000	72,000	80,000	85,000
TOTAL UTILITIES	802,824	640,000	260,000	295,000	505,000	557,000	820,000	865,000
TAXES, INSURANCE, RENT, & LEASE	246,852	246,852	246,852	246,852	246,852	246,852	275,000	275,000
DEPRECIATION	877,524	917,524	647,524	650,000	957,524	960,000	1,577,524	1,600,000
OTHER								
JANITOR SUPPLIES	84,804	60,000	12,000	14,000	40,000	48,000	72,000	84,000
SAFETY SUPPLIES	55,008	55,008	10,000	12,000	38,000	44,000	55,000	60,000
FILTER SUPPLIES	63,996	63,996	6,000	10,000	38,000	42,000	120,000	130,000
STATIONARY SUPPLIES	13,500	13,500	2,400	3,000	10,000	12,000	15,000	18,000
LAB SUPPLIES	30,000	30,000	0	0	22,000	25,000	70,000	80,000
POSTAGE	3,000	3,000	0	0	3,000	3,500	6,000	7,000
SHIPPING SUPPLIES	37,992	37,992	12,000	15,000	30,000	32,000	70,000	80,000
HEAT TRANSFER	12,000	12,000	0	0	0	0	12,000	15,000
NITROGEN	116,004	116,004	60,000	70,000	80,000	90,000	140,000	150,000
LAUNDRY SERVICE	24,996	24,000	3,000	4,000	18,000	20,000	24,000	26,000
RAW MATERIAL USAGE	38,004	38,004	3,000	4,000	30,000	32,000	60,000	65,000
WATER TREATMENT	20,004	20,004	12,000	15,000	20,000	22,000	28,000	36,000
ANTI-POLLUTION	200,004	200,004	50,000	75,000	170,000	180,000	240,000	300,000
MISCELLANEOUS	54,996	48,000	16,000	24,000	30,000	40,000	54,000	60,000
DRUMS FOR OPERATIONS	996	996	500	1,000	1,000	1,000	1,200	2,000
MAINT. MATERIALS	165,732	165,732	50,000	60,000	130,000	140,000	200,000	220,000
CONTRACT MAINTENANCE	170,916	170,916	40,000	50,000	130,000	140,000	210,000	220,000
T & E	9,000	6,000	2,000	3,000	5,000	6,000	9,000	10,000
PROV FOR MAINT TURN	77,688	77,688	20,000	25,000	40,000	50,000	90,000	100,000
AUTO & TRUCK	12,000	12,000	12,000	12,000	12,000	12,000	12,000	18,000
PLANT PROTECTION	66,996	66,996	67,000	67,000	67,000	67,000	67,000	67,000
TELEPHONE	39,996	39,996	40,000	40,000	40,000	40,000	40,000	40,000
MEMBERSHIPS/DUES	3,996	1,800	1,800	2,000	1,800	2,000	1,800	2,400
DATA AUTOMATION	2,004	2,004	2,000	2,000	2,000	2,000	2,000	2,000
DONATIONS	504	504	500	500	500	500	500	500
PROMOTIONS	504	0	0	0	0	0	0	0
FREIGHT PENALTY	9,000	9,000	0	1,000	6,000	7,000	14,000	16,000
CONSULTING FEES	24,996	24,996	12,000	18,000	20,000	25,000	32,000	40,000
EMPLOYEE RELATIONS	6,996	6,996	1,000	1,500	5,000	6,000	7,000	9,000
BUSINESS MEETINGS	504	0	0	0	0	0	500	500
TRAINING	10,008	12,000	3,000	4,000	12,000	15,000	18,000	24,000
TOTAL OTHER	1,356,144	1,319,136	438,200	533,000	1,001,300	1,104,000	1,671,000	1,882,400
CREDIT FOR NWK(A) WASTEWATER	(170,000)	(170,000)	(170,000)	(170,000)	(170,000)	(170,000)	0	0

## NEWARK — DOREMUS AVE. EVALUATION — PLANT STAFFING

	1992 ORIGINAL	BASE CASE	CASE II LOW	CASE II HIGH	CASE III LOW	CASE III HIGH	CASE IV LOW	CASE IV HIGH
<b>SALARIED STAFFING:</b>								
Plant Manager	1	1			1	1	1	1
Production Manager	1	1	1	1	1	1	1	1
Production Engineers	0	0			4	7	10	13
Process Engineer	0	0			1	1	1	1
Environmental Engineer	1	1				1	1	1
Maintenance Supervisor	1	1	1	1	1	1	1	1
Operations Foreman	3	3	1	1	3	3	4	4
Laboratory Technician	3	3			4	4	4	5
Shipping/Receiving Foreman	1	1				1	1	1
Plant Clerk	4	4		1	3	3	5	6
Other	5	5					5	7
<b>TOTAL SALARIED STAFF</b>	<b>20</b>	<b>20</b>	<b>3</b>	<b>4</b>	<b>18</b>	<b>23</b>	<b>34</b>	<b>41</b>
<b>TOTAL SALARY COST</b>	<b>1,040,000</b>	<b>1,040,000</b>	<b>123,400</b>	<b>161,100</b>	<b>879,500</b>	<b>1,203,100</b>	<b>1,796,700</b>	<b>2,189,600</b>
<b>HOURLY STAFFING:</b>								
Lead Operators								
Operators	12	12			4	4	7	7
Assistant Operators	20	20	2	3	14	17	17	21
Maintenance Mechanics	8	8	2	2	6	6	7	8
Trainees					3	3	3	3
Other	10	6						
<b>TOTAL HOURLY STAFF</b>	<b>50</b>	<b>46</b>	<b>4</b>	<b>5</b>	<b>27</b>	<b>30</b>	<b>34</b>	<b>39</b>
<b>TOTAL HOURLY COST</b>	<b>1,950,000</b>	<b>1,781,351</b>	<b>162,400</b>	<b>198,800</b>	<b>1,045,800</b>	<b>1,155,000</b>	<b>1,334,200</b>	<b>1,524,600</b>
<b>TOTAL STAFF HEADCOUNT</b>	<b>70</b>	<b>66</b>	<b>7</b>	<b>9</b>	<b>45</b>	<b>53</b>	<b>68</b>	<b>80</b>
<b>TOTAL STAFF COST \$/YR</b>	<b>2,990,000</b>	<b>2,821,351</b>	<b>285,800</b>	<b>359,900</b>	<b>1,925,300</b>	<b>2,358,100</b>	<b>3,130,900</b>	<b>3,714,200</b>

# NEWARK – DOREMUS PRODUCTION COMPARISONS

PRODUCTION VOLUME IN MMLBS

## BASE CASE

	NWK(D)	BALT	B'VILLE	CHICAGO	MINN	NWK(A)	PENS	VAL PRK	TOTAL
CONVENTIONAL ALKYDS	8	0	0	0	0	0	0	0	8
BASE ALKYDS/OILS	5	0	0	0	0	0	0	0	5
ACRYLICS	1	0	0	0	0	0	0	0	1
COPOLYMERS	11	0	0	0	0	0	0	0	11
AMINOS	10	0	0	0	0	0	0	0	10
WD ALKYDS – KELSOLS	9	0	0	0	0	0	0	0	9
<b>TOTAL</b>	<b>44</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>44</b>

## CASE I

	NWK(D)	BALT	B'VILLE	CHICAGO	MINN	NWK(A)	PENS	VAL PRK	TOTAL
CONVENTIONAL ALKYDS	0	0	0	20	0	8	-10	-10	8
BASE ALKYDS/OILS	0	0	0	0	5	0	0	0	5
ACRYLICS	0	0	0	0	0	0	1	0	1
COPOLYMERS	0	0	11	0	0	0	0	0	11
AMINOS	0	0	10	0	0	0	0	0	10
WD ALKYDS – KELSOLS	0	1	0	0	0	0	0	8	9
<b>TOTAL</b>	<b>0</b>	<b>1</b>	<b>21</b>	<b>20</b>	<b>5</b>	<b>8</b>	<b>-9</b>	<b>-2</b>	<b>44</b>

## CASE II

	NWK(D)	BALT	B'VILLE	CHICAGO	MINN	NWK(A)	PENS	VAL PRK	TOTAL
CONVENTIONAL ALKYDS	0	0	0	20	0	8	-10	-10	8
BASE ALKYDS/OILS	0	0	0	0	5	0	0	0	5
ACRYLICS	0	0	0	0	0	0	1	0	1
COPOLYMERS	0	0	11	0	0	0	0	0	11
AMINOS	0	0	10	0	0	0	0	0	10
WD ALKYDS – KELSOLS	0	1	0	0	0	0	0	8	9
<b>TOTAL</b>	<b>0</b>	<b>1</b>	<b>21</b>	<b>20</b>	<b>5</b>	<b>8</b>	<b>-9</b>	<b>-2</b>	<b>44</b>

## CASE III

	NWK(D)	BALT	B'VILLE	CHICAGO	MINN	NWK(A)	PENS	VAL PRK	TOTAL
CONVENTIONAL ALKYDS	0	0	0	0	0	8	0	0	8
BASE ALKYDS/OILS	5	0	0	0	0	0	0	0	5
ACRYLICS	1	0	0	0	0	0	0	0	1
COPOLYMERS	11	0	0	0	0	0	0	0	11
AMINOS	10	0	0	0	0	0	0	0	10
WD ALKYDS – KELSOLS	9	0	0	0	0	0	0	0	9
<b>TOTAL</b>	<b>36</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>8</b>	<b>0</b>	<b>0</b>	<b>44</b>

## CASE IV

	NWK(D)	BALT	B'VILLE	CHICAGO	MINN	NWK(A)	PENS	VAL PRK	TOTAL
CONVENTIONAL ALKYDS	58	0	0	20	0	-75	5	0	8
BASE ALKYDS/OILS	5	0	0	0	0	0	0	0	5
ACRYLICS	1	0	0	0	0	0	0	0	1
COPOLYMERS	11	0	0	0	0	0	0	0	11
AMINOS	10	0	0	0	0	0	0	0	10
WD ALKYDS – KELSOLS	9	0	0	0	0	0	0	0	9
<b>TOTAL</b>	<b>94</b>	<b>0</b>	<b>0</b>	<b>20</b>	<b>0</b>	<b>-75</b>	<b>5</b>	<b>0</b>	<b>44</b>

## NEWARK – DOREMUS AVE. EVALUATION – SALES/RMC

	SALES VOLUME LBS/YR	1992 ACTUAL AUSP YTD 6/92	1992 ACTUAL AURMC YTD 6/92	SALES \$/YR	RMC \$/YR
ALKYDS	8,000,000	0.4953	0.3034	3,962,400	2,427,200
ACRYLICS	1,000,000	1.0861	0.6187	1,086,100	618,700
COPOLYMERS	11,000,000	0.6536	0.3673	7,189,600	4,040,300
AMINOS	10,000,000	1.0145	0.5331	10,145,000	5,331,000
KELSOLS*	9,000,000	0.7500	0.5000	6,750,000	4,500,000
TOTAL	39,000,000	0.7470	0.4338	29,133,100	16,917,200

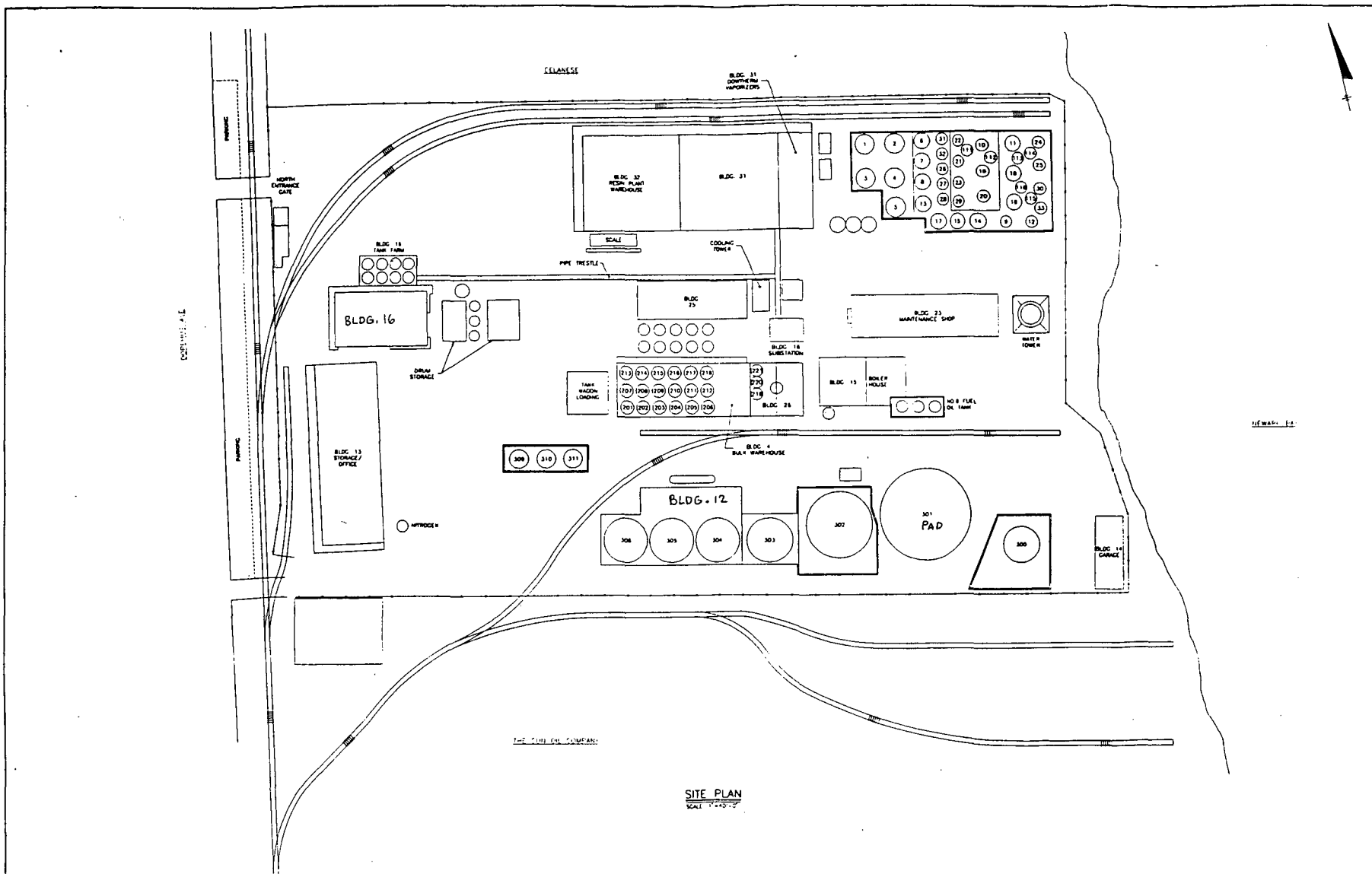
\* Kelsols actually average .80/lb selling price overall and .50/lb RMC. AUSP was reduced to account for product mix.

## NEWARK – DOREMUS AVE. EVALUATION – FREIGHT COST

	BASE CASE	CASE I	CASE II	CASE III	CASE IV
SALES VOLUME LBS/YR	39,000,000	39,000,000	39,000,000	39,000,000	39,000,000
AVG UNIT FREIGHT COST \$/LB	0.030	0.050	0.050	0.030	0.030
TOTAL FREIGHT COST \$/YR	1,170,000	1,950,000	1,950,000	1,170,000	1,170,000

### ASSUMPTIONS:

- BASE CASE – Used CPRD 1992 Budget Average Freight Cost
- CASE I – Added .02/lb to offset displaced production and Bridgeville Amino & Copolymer which must link up with companion shipments of Alkyd, and short shipments because of no companion product at Bridgeville.
- CASE II – Added .02/lb to offset displaced production and Bridgeville Amino & Copolymer which must link up with companion shipments of Alkyd, and short shipments because of no companion product at Bridgeville. In this case NWK(D) is terminalling but the .02/lb penalty has been left on because of additional handling through the terminal as well.
- CASE III – Used CPRD 1992 Budget Average Freight Cost
- CASE IV – Used CPRD 1992 Budget Average Freight Cost

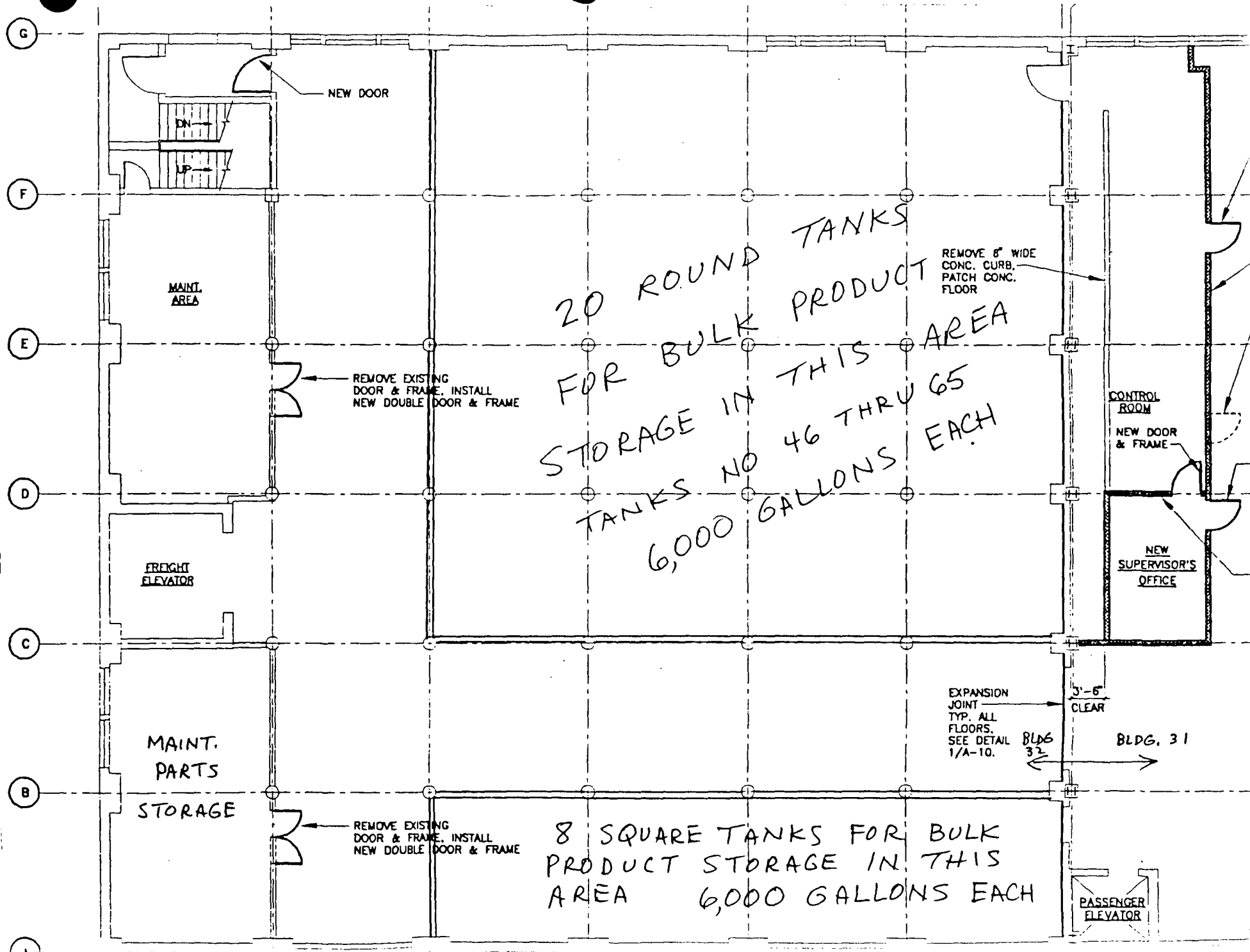


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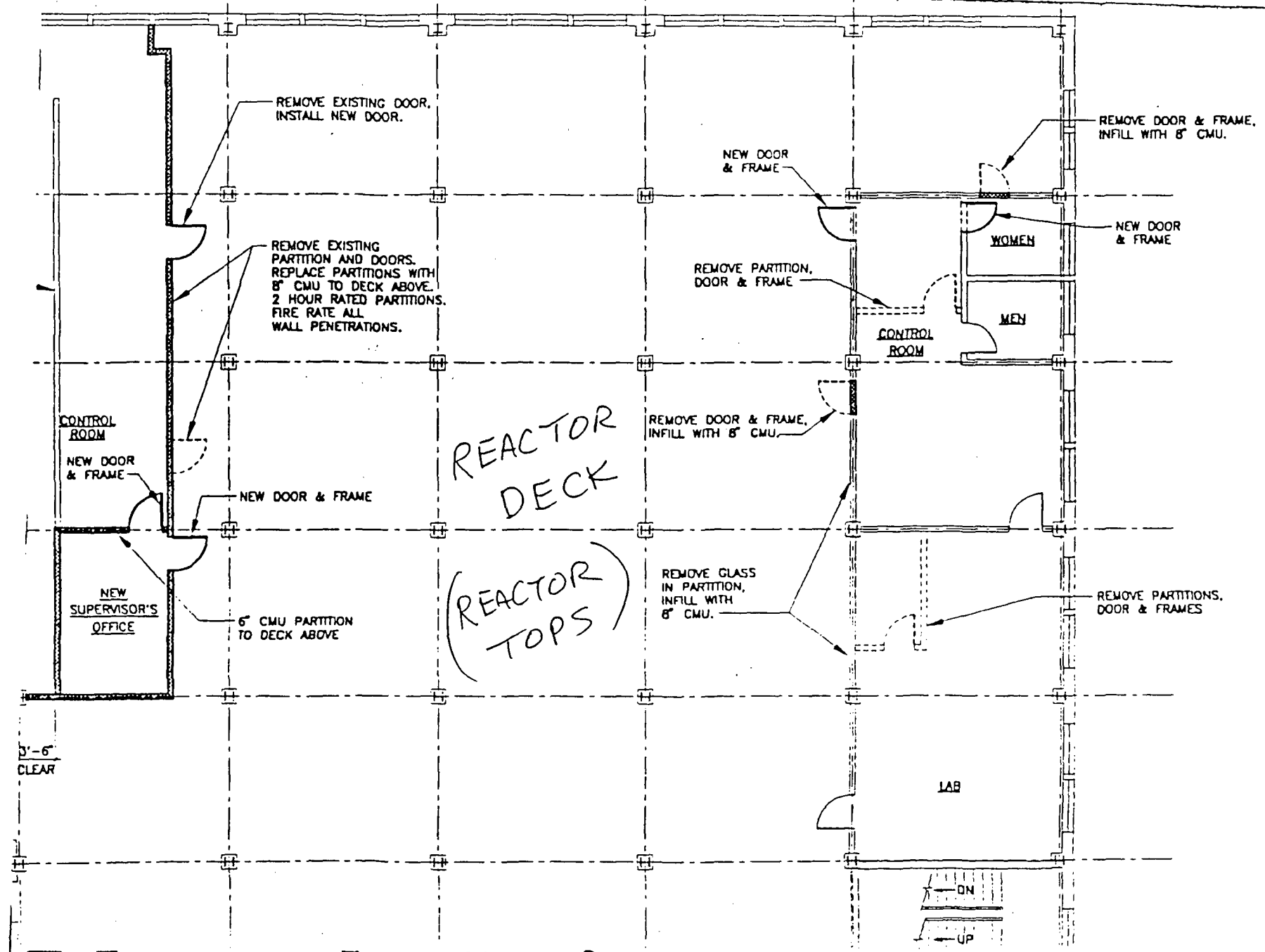
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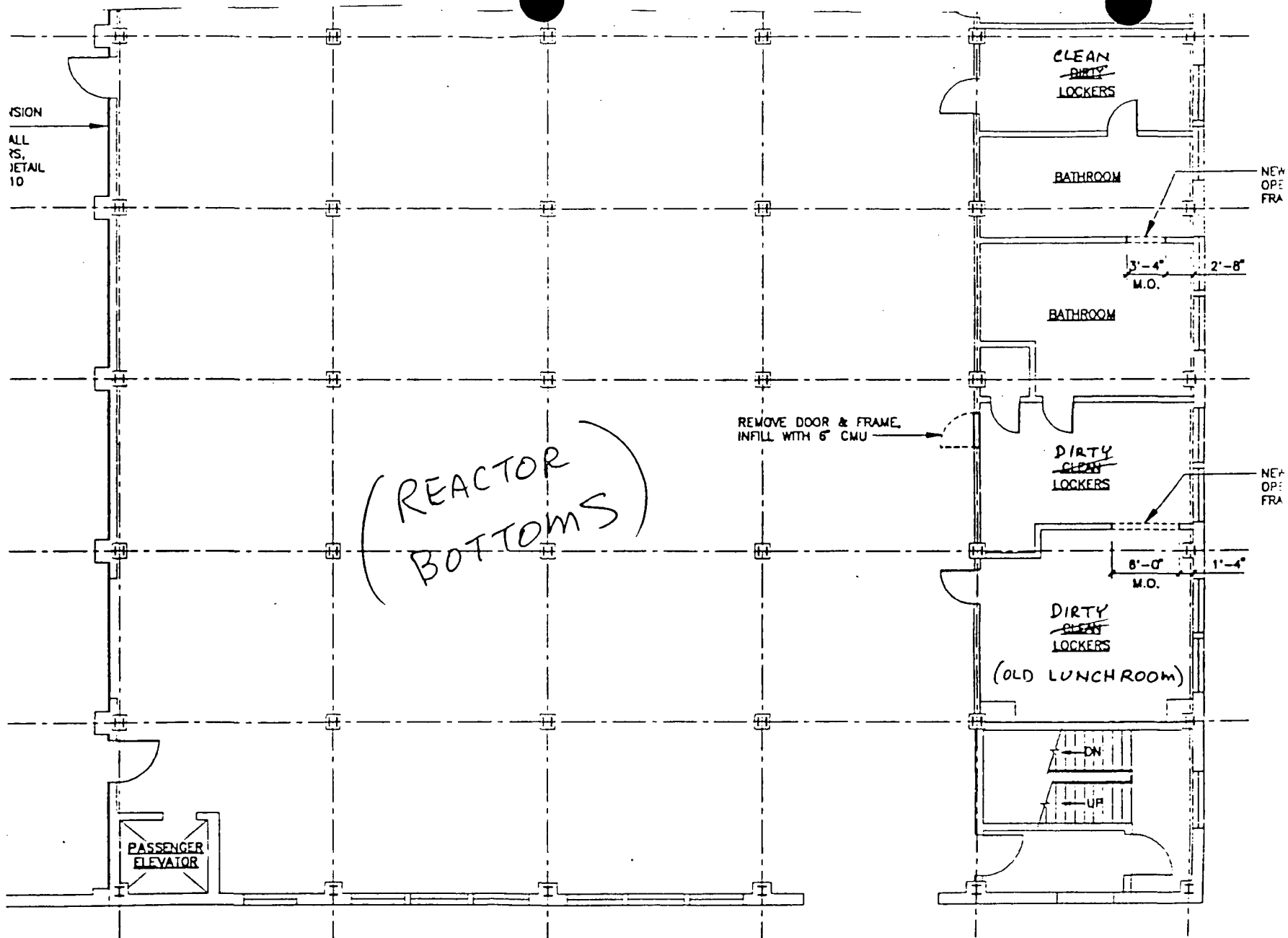
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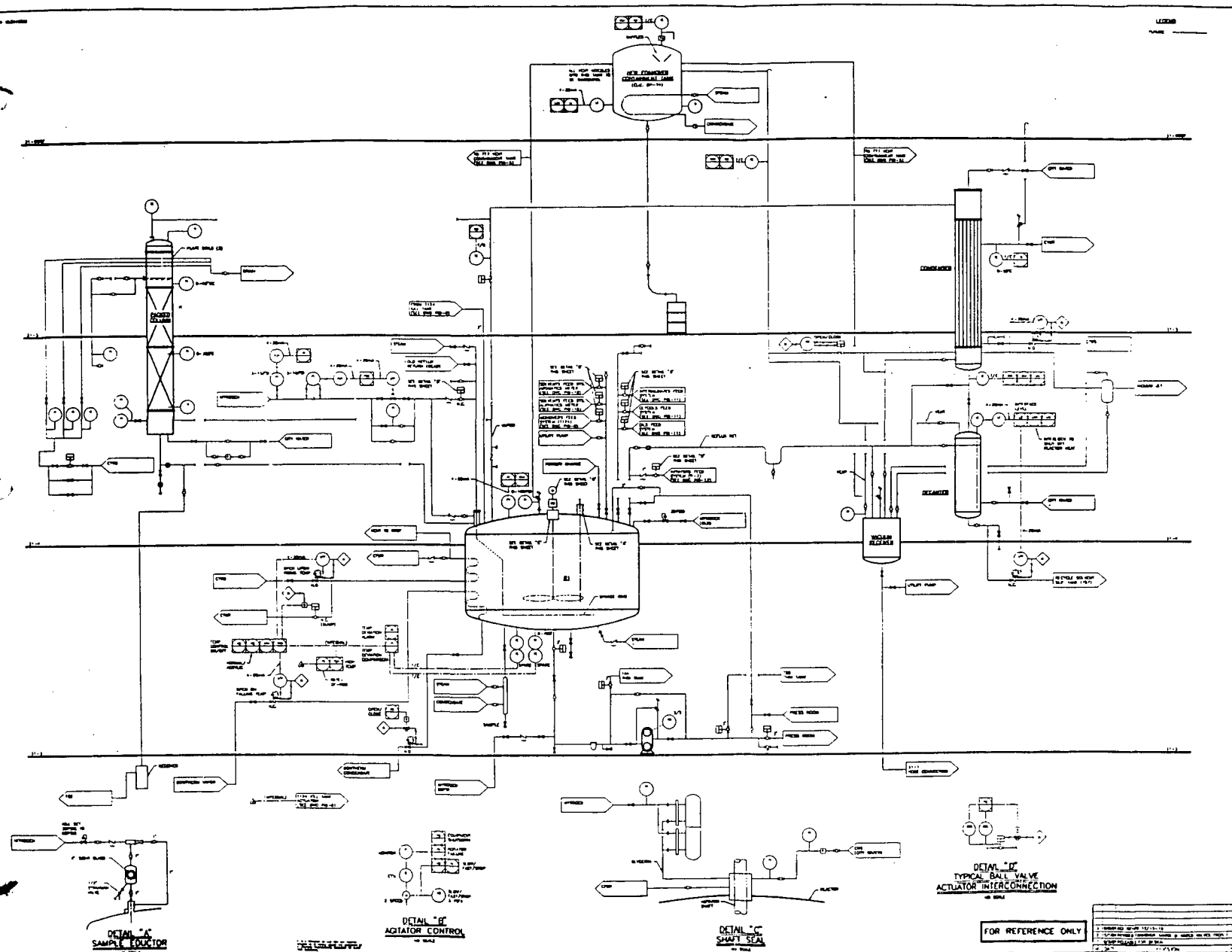
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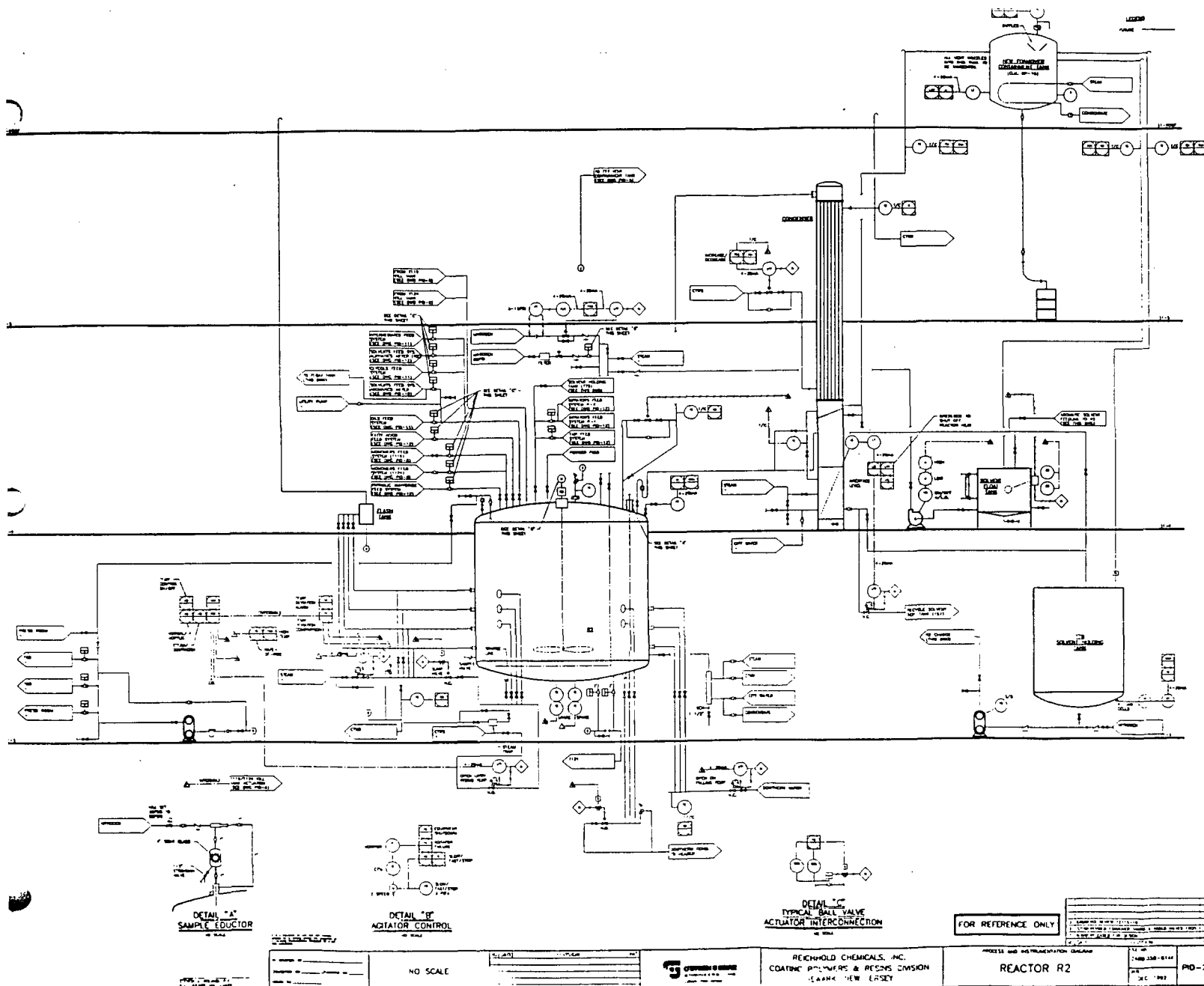
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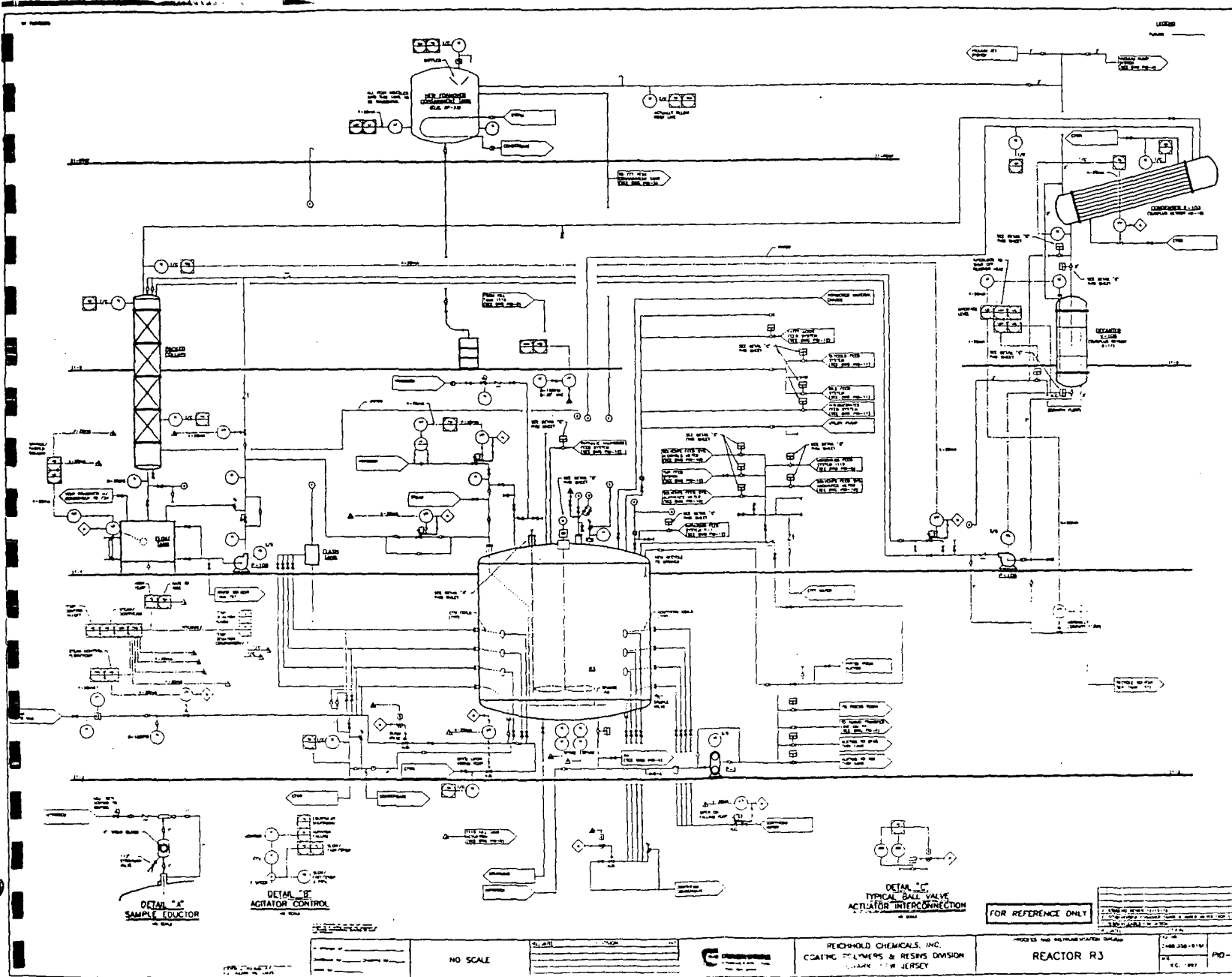
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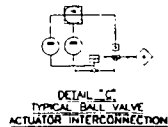
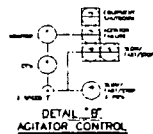
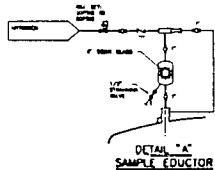
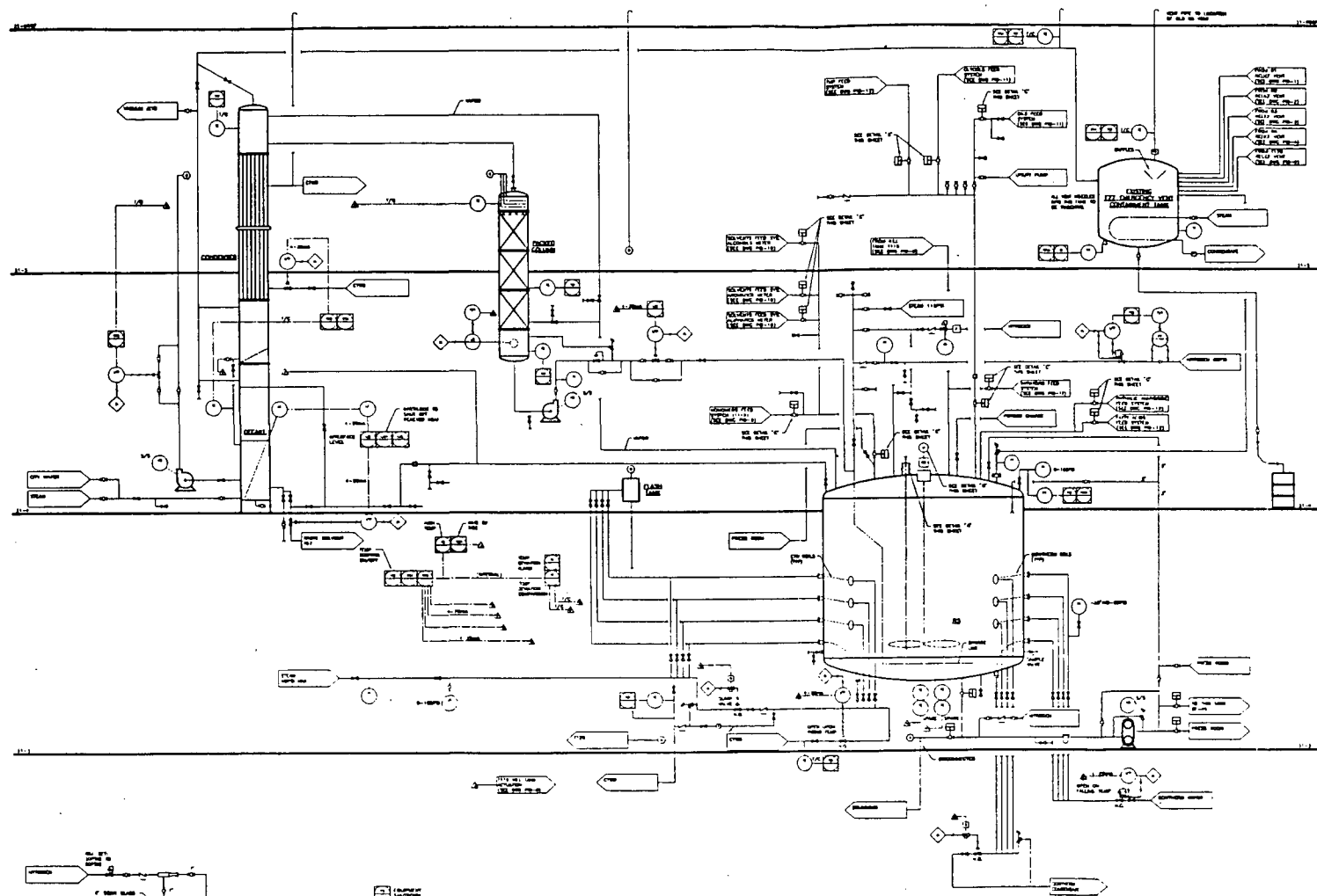


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REACTOR R5

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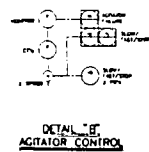
REICHOLD CHEMICALS, INC.  
COATING POLYMERS & RESINS DIVISION  
MORRIS PLANK, NEW JERSEY

FOR REFERENCE ONLY

REACTOR R5

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REICHOLD CHEMICALS, INC.  
 COATING POLYMERS & RESINS DIVISION  
 NEWARK, NEW JERSEY

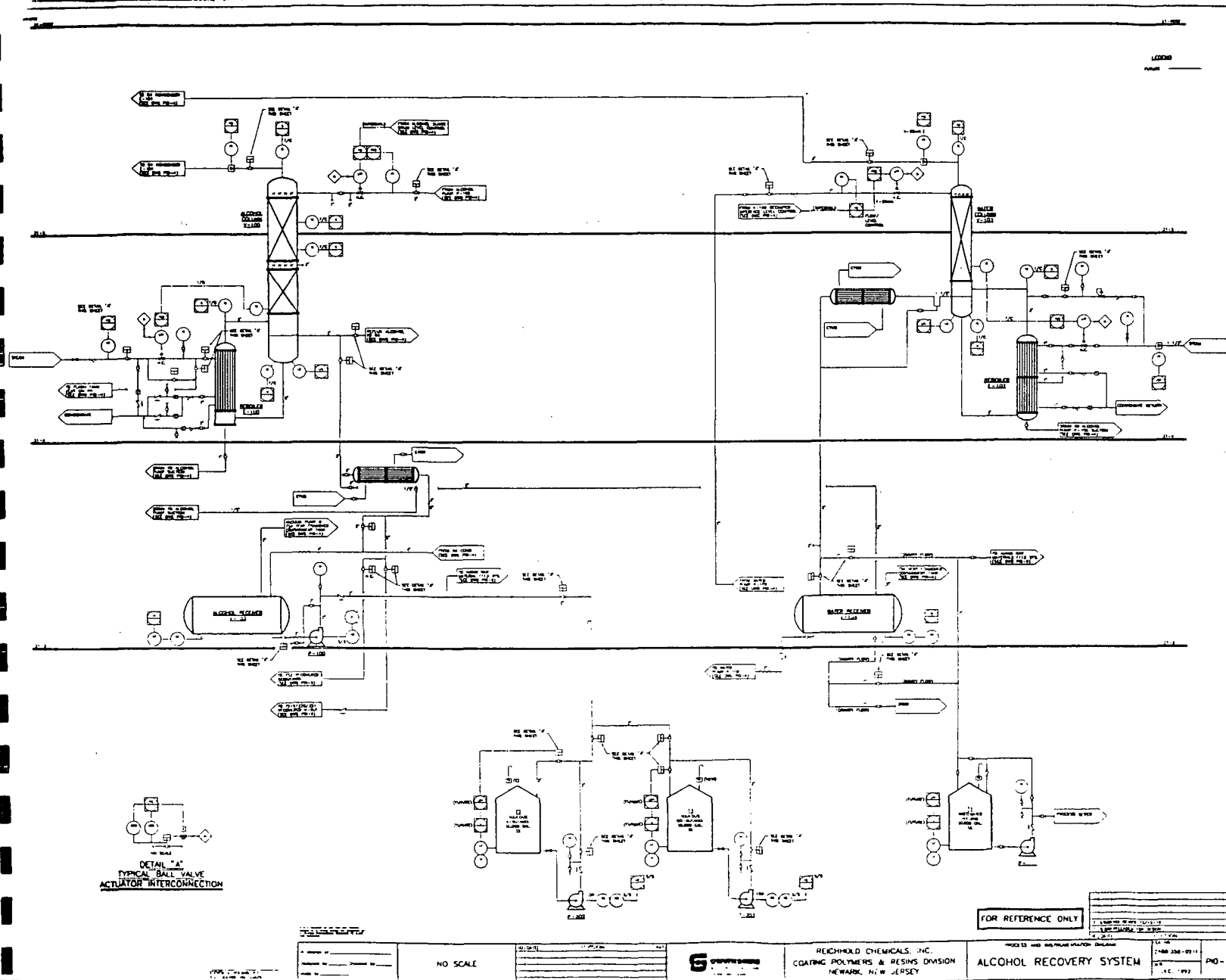
FOR REFERENCE ONLY

TANK 126

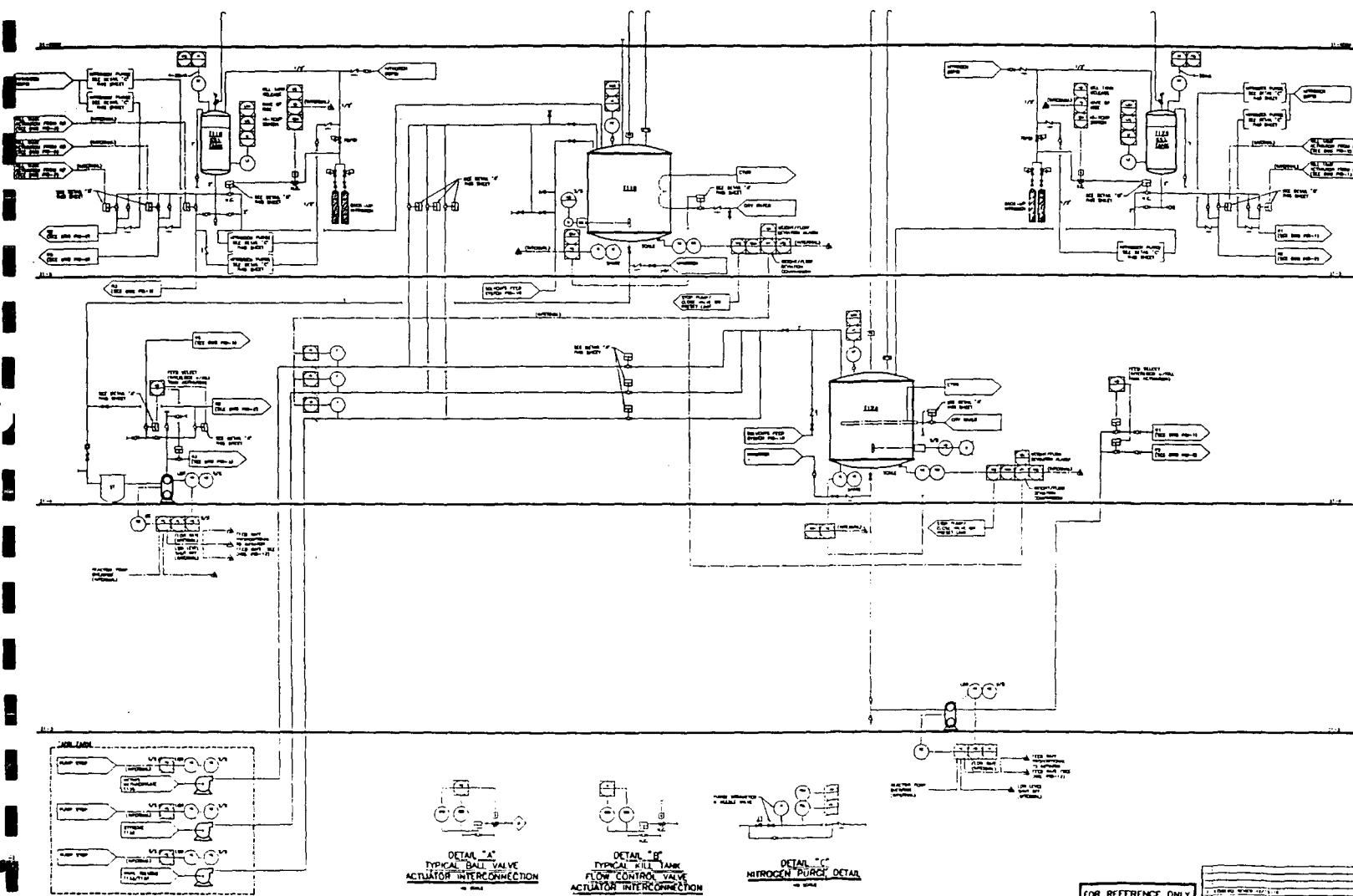
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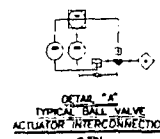
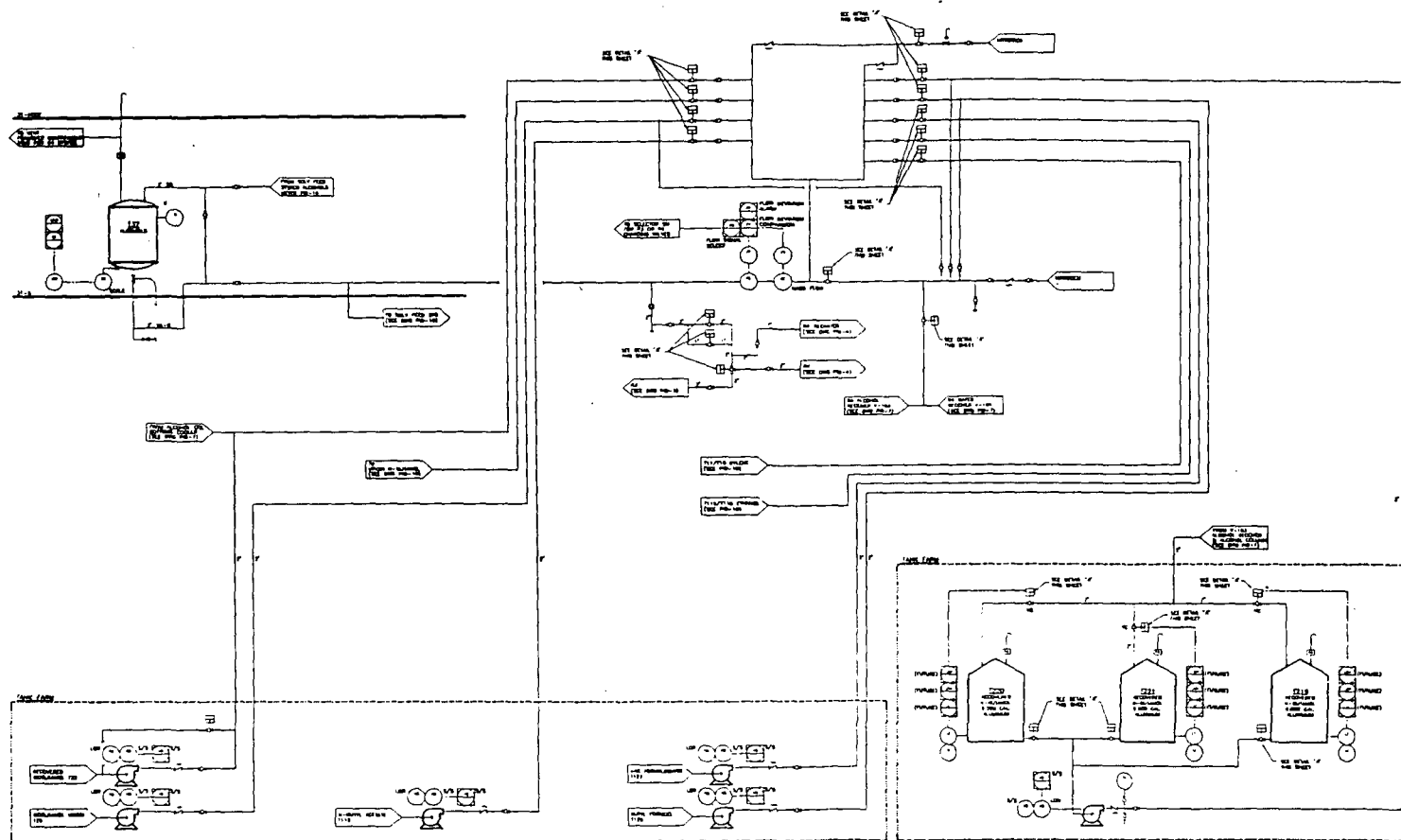




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FOR REFERENCE ONLY

REVISIONS

NO SCALE



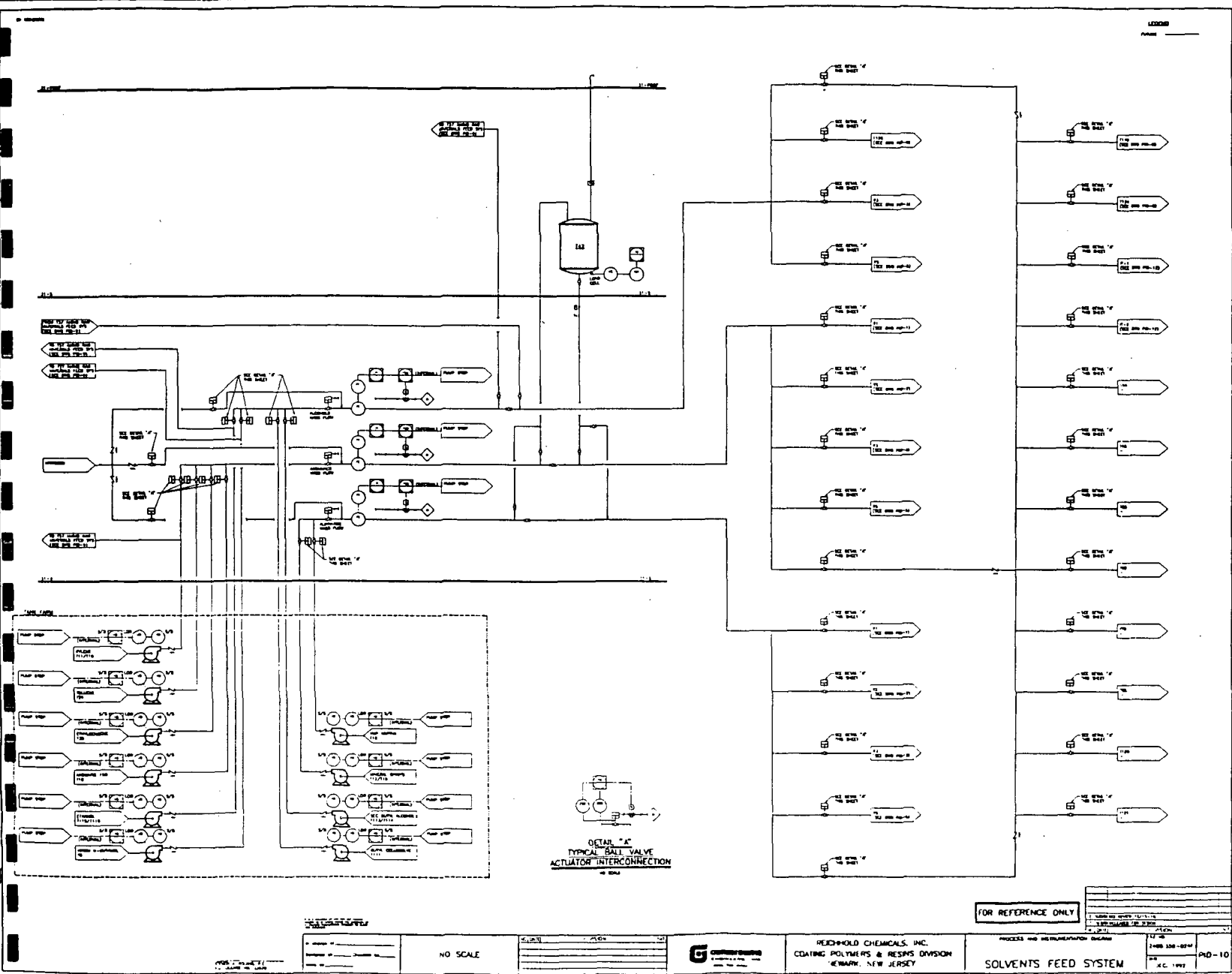
REICHOLD CHEMICALS, INC.  
COATING POLYMERS & RESINS DIVISION  
NEWARK, NEW JERSEY

AMINO RAW MATERIALS  
FEED SYSTEM

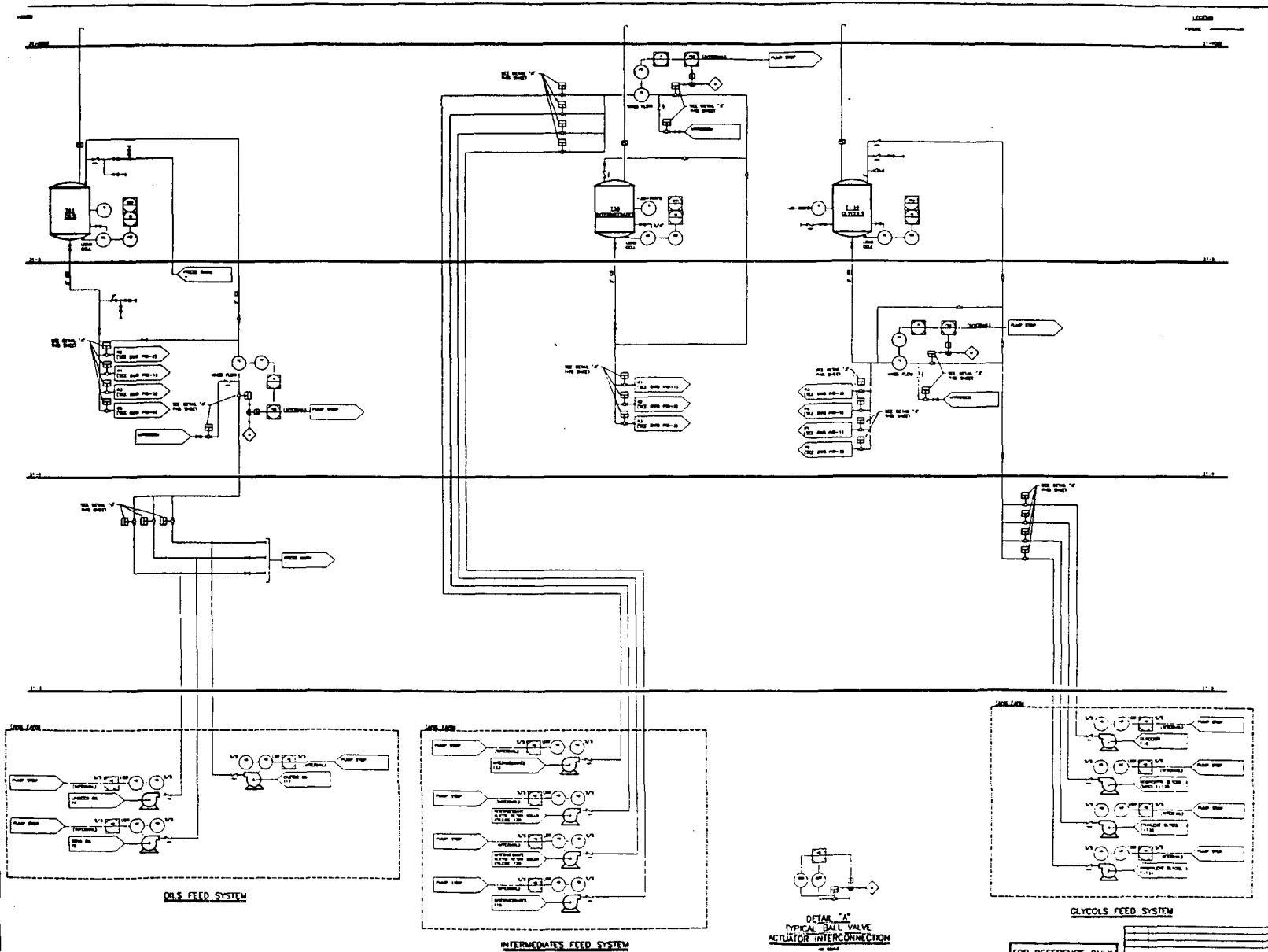
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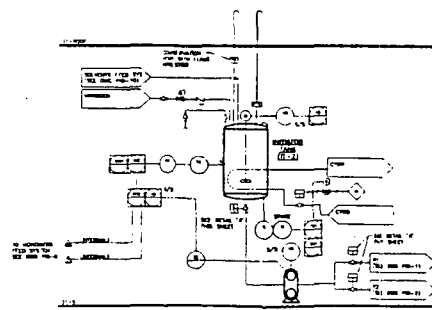
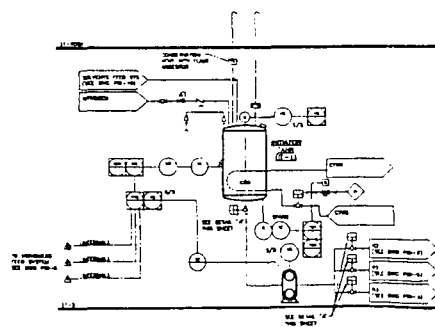
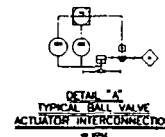
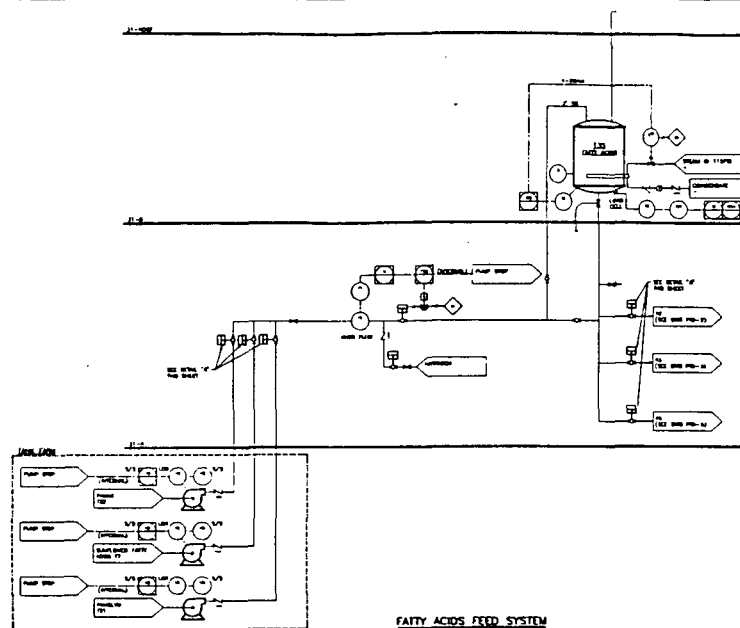
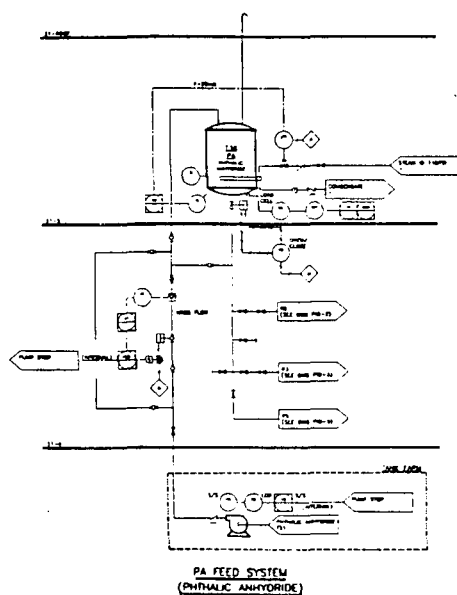
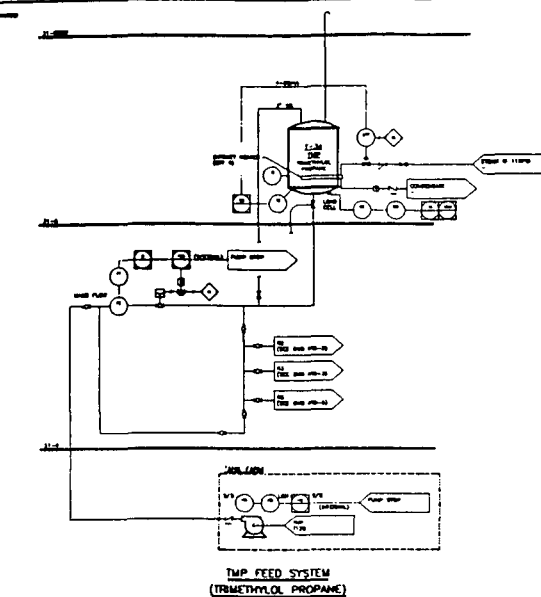
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REVISIONS

NO. 1	DATE	BY	CHKD.

NO SCALE



REICHOLD CHEMICALS, INC.  
COATING POLYMERS & RESINS DIVISION  
NEWARK, NEW JERSEY

FOR REFERENCE ONLY

TMP, FATTY ACIDS, PA, AND  
INITIATORS FEED SYSTEMS

PROJ. NO. 354-0210  
REV. 1  
A.C. 1987

PD-12

842899793

{SCHD1292}

DATE: 17-Dec-92

**REICHHOLD CHEMICALS, INC.**  
BUILDING 31/32 REHABILITATION

**CURRENT EXPECTED START-UP SCHEDULE**

		MOST OPTIMISTIC EQUIPMENT COMPLETION DATE*	MOST REASONABLE EQUIPMENT COMPLETION DATE*	WORST CASE EQUIPMENT COMPLETION DATE*
R-4 REACTOR	(N-BUTYL & ISOBUTYL AMINOS)	MAY 19, 1993	JUNE 9, 1993	JULY 8, 1993
R-2 REACTOR	(ALKYDS, SOL'N ACRYLICS, COPOLYMERS)	MAY 26, 1993	JUNE 16, 1993	JULY 14, 1993
R-3 REACTOR	(ALKYDS, POLYESTERS, COPOLYMERS)	JUNE 2, 1993	JUNE 23, 1993	JULY 21, 1993
R-5 REACTOR	(ALKYDS, KELSOLS, COPOLYMERS)	JUNE 9, 1993	JUNE 30, 1993	JULY 28, 1993
R-1 REACTOR	(ALKYDS, COPOLYMERS)	JUNE 16, 1993	JULY 8, 1993	AUGUST 4, 1993

\* MECHANICAL READINESS ONLY - ASSUMES THAT OPERATING PERSONNEL ARE HIRED, AND TRAINED ADEQUATELY

*Handwritten: F - Doremus - Project*

**REICHHOLD**

**interoffice communication**

TO: N. J. Prato - 345A FROM: R. P. Aston *RP*

PC: R. G. Arnott - 450A LOCATION: RTP

W. R. Biddle - 315A

P. A. Brustofski - 460A DATE: September 18, 1992

W. R. Cox - 320A

J. C. Dean - 315A SUBJECT: Newark-(D) Repair

A. E. Dieffenbach - Newark(D) Status Report No. 1

J. M. Evans - 300C

C. R. Hartshorn - 410A

V. V. Karode - 346A

G. L. King - 320A

L. Loh - 445A

C. A. Lorelli - 440A

F. J. Malczuk - Newark(D)

J. Marques - 470A

A. F. Mohar - 346A

R. J. Naujelis - Newark(D)

A. B. Preusse - 322A

M. Reshamwala - 345A

G. T. Rhyne - 200A

A. F. Vickers - 455A

F. W. Whatton - 410A

G. H. Wilhelm - 345A

*Stamp: SEP 21 1992*

Attached is STATUS REPORT NO. 1 for the repair project at Newark-Doremus Ave. This report will be prepared approximately mid-month, each month.

Generally the project is proceeding on a schedule which will enable the start-up of Amino resin production during June, 1993. Copolymer production will follow 2-3 weeks behind aminos, and Kelsols will follow 2-3 weeks behind copolymers.

**IMPORTANT NEEDS AND CONCERNS**

- Completion of PID's (Piping and Instrument Diagrams) which is the basic design document for the mechanical portion of the project. Many critical path tasks rely on completion of these drawings. Target: Final draft for review - complete by October 9. These draft PID's will be reviewed with in-house safety & environmental personnel, plant & division personnel, and IRI. The copolymer PID's will possibly be reviewed with OSHA.

842899795



REICHHOLD CHEMICALS, INC.  
DOREMUS AVENUE, NEWARK NJ  
BUILDING 31/32 REHABILITATION

STATUS REPORT NO. 1  
September 16, 1992

**Engineering Milestones**

- Completed draft PID's for existing process configuration were submitted to RCI the week of 9/7/92.
- Completed roof demolition plans and specifications on 8/28/92.
- Completed window replacement plans and specifications on 9/8/92.
- Completed roof structural replacement plans and specifications for review with RCI on 9/10/92.
- Completed sketches and specifications for Floor 5 floor drain repairs to facilitate roof demolition activities.
- Completed structural design support for outdoor pipe rack locations.
- Commenced and partially completed building code review for building renovations. Attended meeting with City of Newark code officials.
- Commenced draft PID's for new process configuration.
- Commenced preparation of environmental air permit applications.
- Commenced preparation of Floor 4 and 5 mechanical and electrical plans.
- Commenced preparation of roof membrane plans and specifications.
- Coordination and review of shop drawings as needed during construction phase.
- Completed tour of RCI Delaware plant/instrumentation system on 9/15/92.

**Construction Management Milestones**

- Mobilized field office and site services the week of 8/10/92.
- Completed draft Health & Safety Plan and Hazard Communication Plan for RCI review on 9/8/92.
- Coordinated with Prochem to remove piping and equipment on Floor 5 to facilitate roof demolition.
- Subcontracted IBS to modify outdoor pipe rack supports to facilitate roof demolition activities and maintain site access requirements.
- Conducted prebid meeting for roof demolition subcontract on 8/28/92.
- Bids received for the roof demolition subcontract on 9/9/92.
- Award roof demolition subcontract to American Wrecking on 9/15/92.

- Conducted prebid meeting for window replacement subcontract on 9/8/92.
- Conducted prebid meeting for roof structural replacement on 9/10/92.
- Commenced building permit procurement the week of 9/7/92.

#### **Scheduled Milestones(9/14-10/14)**

- Revised project schedule will be submitted on 9/25/92.
- Completion of final new and existing process configuration PID's and commence preparation of plans and specifications for process instrumentation and control.
- Completion of architectural repair plans and specifications.
- Submission of air permit applications.
- Commence preparation of mechanical/electrical plans and specifications.
- Complete outdoor pipe rack support and Floor 5 floor drain modifications.
- Start roof demolition activities.
- Award of window replacement subcontract the week of 9/21. Initiate procurement/fabrication of window materials.
- Award of roof structural repair the week of 9/21. Initiate procurement/fabrication of structural steel and precast concrete members.
- Solicit bids for roof membrane installation.
- Commence specification and procurement of long-lead equipment and/or materials.

#### **Project Budget**

- Invoice No. 1 was submitted 9/14/92 for costs incurred through 9/11/92 totalling \$99,847.58.
- Invoice No. 2 is estimated to be **\$310,000**.
- The breakdown of the project costs expended through 9/11/92 are as follows:

Engineering	\$54,204
Construction Management	\$19,838
Construction	<u>\$25,805</u>
	<u>\$99,847</u>

- An update of the projected cash flow for the project is attached.

BGTSEP92.WK1

DATE: 9/16/92

REICHOLD CHEMICALS, INC.  
BUILDING 31/32 REHABILITATION

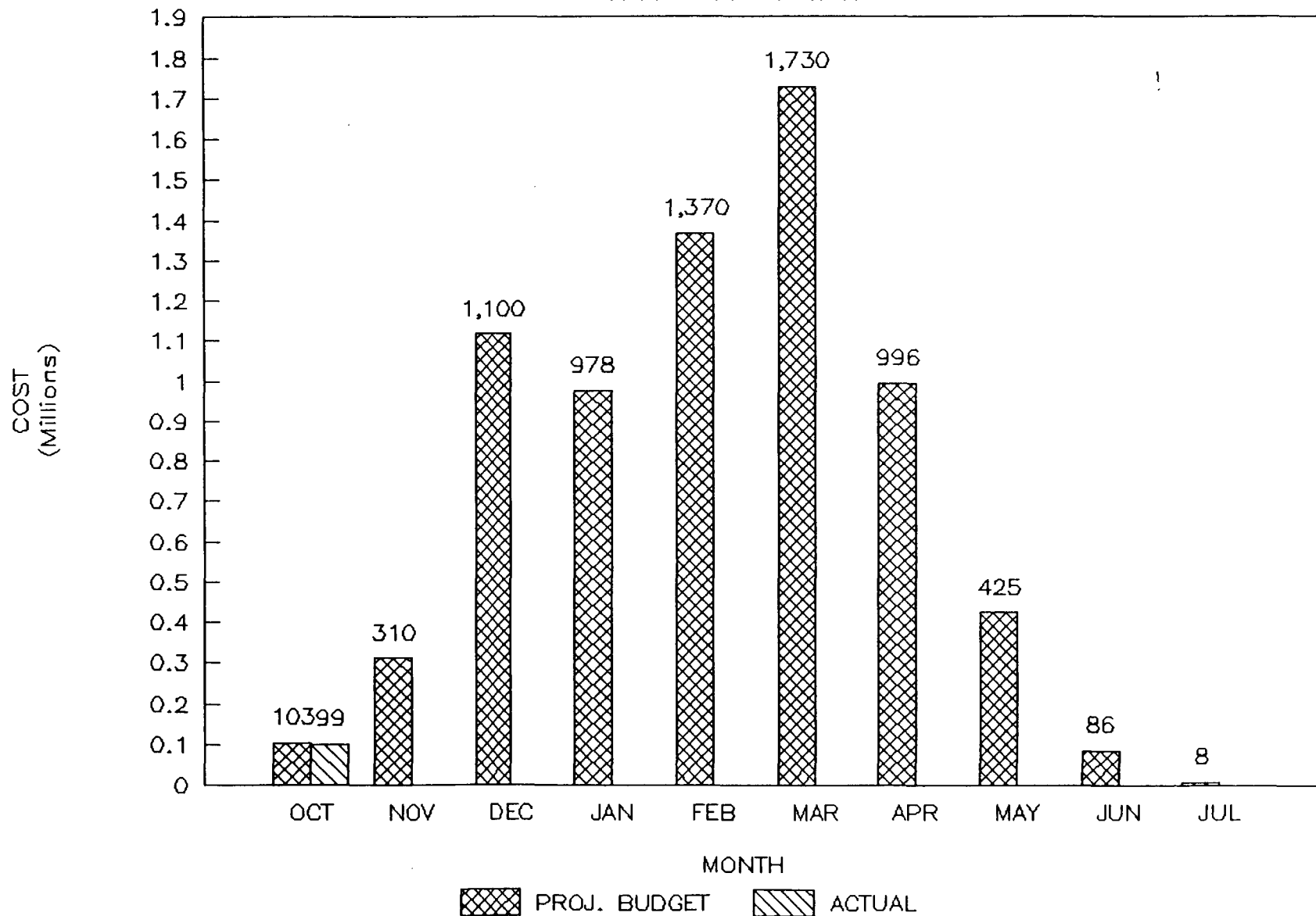
SEPTEMBER '92 STATUS REPORT

MONTH	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	TOTAL
BUILDING 31/32 REHABILITATION											
PROJECTED MONTHLY TOTAL	103,153	310,500	1,118,169	978,276	1,370,703	1,730,202	996,273	424,935	86,056	7,544	7,125,811
PROJECTED CUMULATIVE TOTAL	103,153	413,653	1,531,822	2,510,098	3,880,801	5,611,003	6,607,276	7,032,211	7,118,267	7,125,811	
ACTUAL BILLING	99,847	0	0	0	0	0	0	0	0	0	
ACTUAL CUMULATIVE BILLING	99,847	99,847	99,847	99,847	99,847	99,847	99,847	99,847	99,847	99,847	
MONTHLY DIFFERENCE	(3,306)	0	0	0	0	0	0	0	0	0	
CUMULATIVE DIFFERENCE	(3,306)	(3,306)	(3,306)	(3,306)	(3,306)	(3,306)	(3,306)	(3,306)	(3,306)	(3,306)	

842899798

# BUILDING 31/32 REHABILITATION

## CASH FLOW PROJECTION



842899799

F - Doremus - Project

**REICHHOLD**

**interoffice communication**

TO: J. Gaither - 435A  
R. Aston - 410A  
R. Williams - 300C  
T. Rhyne - 200A  
J. Dobson - 792  
J. Elmo - 320A  
R. Arnott - 450A  
A. Mohar - 346A  
M. Reshamwala - 345A  
R. Bingham - 410A  
L. Graham - 455A

FROM: N. Prato - 345A *[Signature]*

LOCATION: RTP

DATE: June 13, 1993

SUBJECT: **PERT DIAGRAM  
DOREMUS  
STARTUP**

Attached is a pert diagram/action plan for the restart of the Doremus plant that was developed during our initial meeting on June 10, 1993.

Please advise of any recommended additions, comments or deletions to this plan.

NJP/smh

93177.mem

*Paul,  
Any comment?*

*NO. DAN UYESATO IS SENDING NICK  
THE LETTER OF NON-APPLICABILITY FOR  
SIGNATURE, WHICH DESCRIBES THE  
SCHEDULE BY WHICH WE COMMITTED  
TO STARTUP AND TRAINING.*

*Paul*

842899800

# DOREMUS AVENUE RESTART PROJECT

Responsible Person	Action	June		July		August		September		October		November		December		January		February		March	
		15	30	15	30	15	30	15	30	15	30	15	30	15	30	15	30	15	30	15	30
Aston	Complete construction																				
Aston	Plant Schematics																				
Aston	Building 16 demolition																				
Aston/Sight Manager	Site cleanup																				
Rhyne	Contract																				
Prato/Gaither/Rhyne	Site Manager																				
Site Manager/Aston	Office configuration – short term																				
Site Manager/Patel	QC staff – hire/train																				
Patel	QC lab equipment																				
Site Manager/Rhyne/Prato	Core force staffing plan for start up																				
Site Manager/Prato/Elmo	1993 start up budget																				
Site Manager/Rhyne	Hire/recall																				
Arnott/Aston	Process safety management																				
Site Manager/Aston/Rhyne/Bingham	Employee training																				
Arnott/Aston	OSHA citation response																				
Brechbiel	Industry announcement																				
Mohar/Williams	Formulas																				
Site Manager/Prato/Aston	Identify start up team																				
Site Manager/Prato	Production plan																				
Site Manager/Startup Team	Start up																				
Irizarry	Product qualification																				
Biddle/Irizarry/Dobson	Marketing plan 1994 product lines																				
Reshamwala/Irizarry	Tolling arrangements																				
Site Manager/Rhyne	Operating committee formed																				

842899801

# DOREMUS AVENUE RESTART PROJECT

<u>Responsible Person</u>	<u>Action</u>	<u>June</u>		<u>July</u>		<u>August</u>		<u>September</u>		<u>October</u>		<u>November</u>		<u>December</u>		<u>January</u>		<u>February</u>		<u>March</u>	
		15	30	15	30	15	30	15	30	15	30	15	30	15	30	15	30	15	30	15	30
Site Manager/Rhyne	1994 staffing plan																				
Fronek/Elmo/Prato/Site Manager	1994 operating budget																				
Aston/Sight Manager	1994 capital plan																				

## Long Term Plans

- Office arrangement/consolidation
- Training activities
- Employee relations
- Site improvement
- Marketing plans

842899802



C SJR, DES, S. McMASTER,  
JIM FOX, GAA

FILE: 82488-~~585~~ #2  
358

State of New Jersey  
Department of Environmental Protection and Energy  
Environmental Regulation  
CN 401  
Trenton, NJ 08625-0401

FILE COPY

Scott A. Weiner  
Commissioner

February 2 1993

John R. Weingart  
Assistant Commissioner

RECEIVED

FEB 8 1993

O'BRIEN & GERE

DATE

Re: Permits Required To  
Rehabilitate and Rebuild

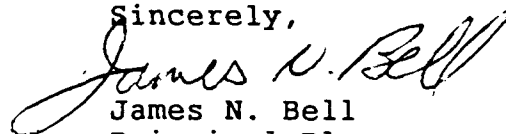
Dear Mr. Aston:

The Office of Permit Information and Assistance received your Permit Identification Application (PIA) and has forwarded it to the appropriate permitting programs in the DEPE. As I indicated to your consultant, Mr. Gary Angyal of O'Brien and Gere Engineers, a review of the information provided indicated that, with the possible exception of an air permit no new permits or modifications of existing permits would be required.

This determination was based on the information submitted at this time. The Air Quality Regulation group indicated that any existing air apparatus that needed to be replaced would merely need an application to replace the same equipment. However, if the air control apparatus is replaced with equipment different than the original, a new permit application would have to be submitted. If you have any further questions on the replacement of your air equipment, I suggest you contact the Bureau of New Source Review at (609) 633-2753.

Should the information provided in you PIF change, the determinations discussed in this letter could also change. If you are in need of further assistance do not hesitate to contact me at (609) 292-2006.

Sincerely,

  
James N. Bell  
Principal Planner

cc: Jeanne Mroczko, Asst. Director  
Gary Angyal, O'Brien and Gere



## REICHHOLD CHEMICALS, INC.

### COATING POLYMERS AND RESINS DIVISION DOREMUS PLANT, NEWARK, NJ REHABILITATION PROJECT STATUS REPORT NO. 13

#### DISTRIBUTION:

R. G. Arnott	- 450A
P. D. Ashkettle	- 430A
W. R. Biddle	- 315A
R. F. Bingham	- 410A
W. G. Branson	- 340A
P. A. Brustofski	- 455A
J. C. Chang	- 450A
W. R. Cox	- 320A
J. C. Dean	- 315A
A. E. Dieffenbach	- Newark (D)
J. Elmo	- 330A
J. M. Evans	- 300C
S. M. Fronek	- 240A
J. S. Gaither	- 430A
J. L. Graham	- 455A
C. R. Hartshorn	- 410A
R. Holcombe	- 340A
N. L. Hickey	- 360A
R. Irizarry	- 322A
F. J. Malczuk	- Newark (D)
P. F. Martin	- 320A
A. F. Mohar	- 346A
N. J. Prato	- 315A
A. B. Preusse	- 322A
M. Reshamwala	- 345A
G. T. Rhyne	- 200A
D. E. Sartore	- 347A
A. F. Vickers	- 455A
F. W. Whatton	- 410A

**REICHHOLD**

---

## interoffice communication

TO: DISTRIBUTION:

FROM: R. P. Aston

LOCATION: RTP

DATE: September 20, 1993

SUBJECT: **Newark-(D) Repair**  
**Status Report No. 13**

Attached is **STATUS REPORT NO. 13** for the repair project at Newark-Doremus Ave.

Piping and mechanical is expected to be essentially complete by early November. Delivery of the Johnson-Yokogawa control system has begun with additional components due during the next 2-3 weeks. JYC electrical drawing have not been received to date but are expected within the next 2 weeks, enabling wiring of the JYC field control units to commence. Other electrical wiring is progressing well and should enable the de-bugging/testing process to commence by mid to late November. Exterior cleaning and repair work is 70% complete and should be finished by mid-October. The cooling towers and passenger elevator are near completion and should be operational by early October. The actual production configuration is still being studied, however original production plans have been used for basic programming and for environmental permitting. Additional permit modification and programming of the JYC system will be conducted as necessary as more specific production plans develop. The repair cost is still estimated at \$8,100,000.

# REICHHOLD CHEMICALS, INC.

DOREMUS AVENUE PLANT, NEWARK, NJ  
BLDG. 31/32 REHABILITATION PROJECT

## STATUS REPORT NO. 13

September 20, 1993

Milestones (8/15/93-9/15/93) and Projected (9/16/93-10/15/93)

### STRUCTURAL AND ARCHITECTURAL REHABILITATION

- Zack Painting is stripping damaged paint from doors and stairs. The surfaces will be stripped, primed and painted. All new doors will be primed and painted. Expected completion is October 15.
- Barbato Construction is rebuilding the parapet wall on the roof between buildings 31 & 32 Barbato and their roofing subcontractor will work together to raise the parapet and properly flash.
- Barbato is 98% complete with door repairs/replacements.

### MECHANICAL/PROCESS REHABILITATION

- Otis Elevator has installed all doors and frames for the passenger elevator. Installation of the elevator cab is underway. The elevator should be operational by October 12.
- Otis Elevator and Atlantic elevator are quoting on rehabilitation of the freight elevator. Quotes are due Sept. 30.
- The balance of damaged flame arresters are on order and delivery is expected Sept. 27.
- A price quote is being obtained to repair damaged stair nosing and structural members on the top flight of the northwest stair tower.
- Higgins completed all building 31/32 sprinkler systems.

- Mid-Atlantic Mechanical is finished installing the replacement HVAC unit for the peroxide room on Sept. 14 however the unit still has to be tested before the contract is complete. Ductwork is complete for two rooms on the west end of the 4th floor of building 32. Cooling tower water piping to the unit is being repaired by Prochem and has to be completed prior to unit start-up.
- Cooling tower rehabilitation/decontamination work has been completed by Atlantic Cooling Tower.
- Groome Cleaning has completed approx. 90% of the exterior decon/cleaning work, and has primed most of the surfaces to be painted. Painting is to begin Sept. 16, weather permitting. Heritage Insulation will be removing/replacing damaged piping insulation jacketing, after Groome completes painting.
- Ordered unit heater for 32-5 "pump room" (maintenance parts storage room). Delivery expected the week of Sept. 27.
- The dowtherm insulation status remains unchanged. The system has been refilled with dowtherm. Several 3/4" relief valves were found to be damaged in the piping system and have been ordered. Delivery is expected week of Oct. 4. Further heat-up and leak testing will be resumed at that time.
- Heritage insulation is removing asbestos insulation in the tank farm where access is needed to repair split steam tracing. Heritage is also insulating steam and condensate piping and tanks inside buildings 31/32.
- Pro-Chem is essentially complete with utilities piping and primary vacuum system piping in building 31, F5. They are continuing with process piping repair work on floors 4 & 5.
- Cambridge completed cleaning tank T119 and jet-blasting plugged condenser tubes on R2, 3 and 5.
- Gerhart scale is 75% complete with the repair/replacement work on the various weigh systems and should be completed by Oct. 1.
- Custom Air Conditioning has been awarded the HVAC work for repair/replacement of the 31-3 Lunchroom/Lockerroom/Bathroom units. Delivery of the Carrier units has been delayed and is scheduled for the week of Sept. 20.
- Reichhold corporate environment is still reviewing plans and a proposal received from ENSI for cleaning the 44% formaldehyde and butyl formcel storage tanks, and disposal of the materials.
- IBS completed demolition of the damaged penthouse on the roof of building 26.

- Jackson roofing completed re-roofing building 25. They are also quoting a similar replacement roof on building 26.
- All building 31/32 roof fans and exhausters are installed. Sheet metal contractors are currently quoting the ductwork connections.
- Vacuum ejector system no. 2 (two-stage jet system) is currently being specified and is scheduled to be ordered by Oct. 8.
- Bogush Plumbing is scheduled to repair drain piping under the floor of building 32-1 which is totally blocked from debris which came down through the roof drain system. Similar work is anticipated in 31-1 after completion of 32-1.
- S & S valve service has tested and reset the reactor safety valves. Valves will be reinstalled the week of Sept 20.
- Industrial Floor Corporation has been contracted to resurface the damaged floors of building 31 floors 3,4 & the fifth floor hot room.
- Remaining safety relief valves were ordered on Sept. 7, for delivery on Sept. 28.
- Quotation has been received for the replacement floor scale for 31-5. It is an exact replacement of the one which was destroyed.

#### ELECTRICAL/I&C REHABILITATION

- Ground grid rehabilitation as of Aug 16, 1993:
  - #1/0 main riser (1st floor to fifth) installation completed.
  - #4/0 loops (5th floor) bldg. 31/32 completed.
  - Main grounding grid branches bldg. 31/32 completed.
  - Drops (#4 AWG & #6AWG) off main branches, cadweld & lug connections to existing vessels/equipment 90% complete. Final testing of system to begin Sept. 27.
- Conduit installation in building 31-5:
  - All main conduit runs completed.
  - Wiring & controls completed for charge chute blowers, T-125 agitator & pump, T-119 agitator & pump, building 31 roof exhauster, drumming exhauster, and 32-5 battery chargers.
  - Installation of 440 VAC outlets to begin week of Sept. 20.
- Conduit installation in building 32-5:
  - All main conduit runs completed.
  - Wiring & controls completed for peroxide room HVAC, peroxide room high temp alarm, filter press exhaust blower, and amino press exhaust blower.

- Conduit installation in building 31-4:
  - Conduit runs are 50% completed.
  - Lighting, 110V, and emergency lighting to be completed Sept. 24.
- Conduit installation balance of buildings 31/32:
  - Existing conduit and wiring inspection/replacement is being accomplished on an as needed basis on any conduits/wiring impacted by the fire/water damage.
- Instrumentation and controls:
  - Termination cabinets "A", "B" & "C" have been installed and "tied-in" to the raceways.
  - Termination cabinet "D" to be "tied-in" to raceways by Sept. 24.
  - Intrinsically safe, analog and power raceways to be "tied-in" by Sept. 30.
  - Rosemount pressure transmitters, pressure-to-current converters & Drexelbrook level transmitters to be installed the week of Sept. 27.
  - OBG to tabulate bids for CO2 suppression and foam generation systems and review with RCI week of Sept. 20.
  - OBG to receive and review bids for the passenger elevator smoke detection system (required by BOCA code) the week of Sept. 20. Also to receive & review bids for the intercom system week of Sept. 20.
  - OBG to procure Appleton control stations as needed per wiring diagrams.
  - Replacements for damaged flow transmitters 404-FT-017, 018 & 020 were ordered Sept. 14 (for Reactor 4 amino resins).

#### **PERMITTING**

- R4 permit has been re-submitted to the NJDEP.

**PROJECT BUDGET**

- O'Brien & Gere invoice no. 13 was received September 20, 1993 for costs incurred through September 16, 1993 totaling \$858,298.
  - No additional Johnson-Yokogawa partial invoices have been received. The JYC control system hardware was partially delivered on Sept. 7. and the balance of their hardware should be delivered within the next 4 weeks with invoicing expected to follow close behind.
  - Exterior cleaning and debris removal (of various construction debris removed from buildings 31/32), was contracted directly by RCI with IBS, Inc. and billed directly to RCI during the past month. An invoice was processed by RCI for \$33,387 for this work.
  - The breakdown of the project costs expended through September 16, 1993 is as follows:

Direct bill to RCI (DCS)	\$ 354,000
Direct bill to RCI (Other)	\$ 33,387
Engineering	\$ 728,029
Construction Management	\$ 430,649
Construction	<u>\$5,011,013</u>
- Total** **\$6,557,078**
- An update of the projected cash flow for the project is attached.

# REICHOLD CHEMICALS, INC.

## BUILDING 31/32 REHABILITATION

### STATUS REPORT NO. 13

#### SUMMARY OF ACTUAL AND PROJECTED COSTS

	SEPT '92	OCT	NOV	DEC	JAN '93	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL
ORIGINAL PROJECTED COSTS: ADDITIONAL DECONTAMINATION:* <small>(Rent, remove contents, dispose of non-salvageable product from reactors, tanks, filters, piping, etc., by RC 1/30contractors)</small>				150,000	100,000	83,585											333,585
BUILDING 31/32 REPAIRS	103,153	310,500	1,100,000	830,000	1,270,000	1,650,000	1,000,000	520,000	400,000	94,373	0	0	0	0	0	0	7,278,026
ORIG. PROJECTED TOTAL	103,153	310,500	1,100,000	980,000	1,370,000	1,733,585	1,000,000	520,000	400,000	94,373	0	0	0	0	0	0	7,611,611
PROJECTED COSTS: ADDITIONAL DECONTAMINATION:* BUILDING 31/32 REPAIRS	99,847	321,892	351,840	448,756	264,676	438,982	408,934	625,048	491,857	503,624	770,765	806,309	700,238	730,000	610,000	150,000	7,722,768
ACTUAL/PROJECTED TOTAL	99,847	321,892	351,840	448,756	264,676	438,982	408,934	625,048	535,552	538,551	794,812	836,503	891,685	790,000	640,000	150,000	8,137,078
ACTUAL COSTS: ACTUAL COST ADDIT. DECONTAM. ACTUAL COST BLDG 31/32 REPAIR	99,847	321,892	351,840	448,756	264,676	438,982	408,934	625,048	43,695	34,927	24,047	30,194	191,447	60,000	30,000		324,310
ACTUAL COST TOTAL	99,847	321,892	351,840	448,756	264,676	438,982	408,934	625,048	491,857	503,624	770,765	806,309	700,238				6,232,768
ACTUAL CUMULATIVE TOTAL	99,847	421,739	773,579	1,222,335	1,487,011	1,925,993	2,334,927	2,959,975	3,495,527	4,034,078	4,828,890	5,665,393	6,557,078				

ORIGINAL ESTIMATE BY OB&GT FOR BUILDING 31/32 REHABILITATION (Does not include earlier Phase I, II & III emergency response or clean-up costs)  
(Also does not include costs to replace the T125 monomer/initiator premix system which was not originally planned for replacement).

7,800,239

Reduction negotiated between IRI and OB&GT in early August, 1992

(188,628)

REVISION-1 "BASE" BUILDING 31/32 REHABILITATION ESTIMATE

7,611,611

Functional replacement of T-125 System

275,000

REVISION-2 "BASE" BUILDING 31/32 REHABILITATION ESTIMATE

7,886,611

Replacement of two-stage vacuum jet system on R-1, which was not originally thought to be necessary;  
however, it is now necessary to proceed with this due to the need to resume production of oil products in R-1.  
The third vacuum jet system, a two-stage system, is not planned for replacement at this time.

100,000

REVISION-3 "BASE" BUILDING 31/32 REHABILITATION ESTIMATE

7,986,611

CURRENT PROJECTED BUILDING 31/32 REHABILITATION ESTIMATE (FROM ABOVE)

8,137,078

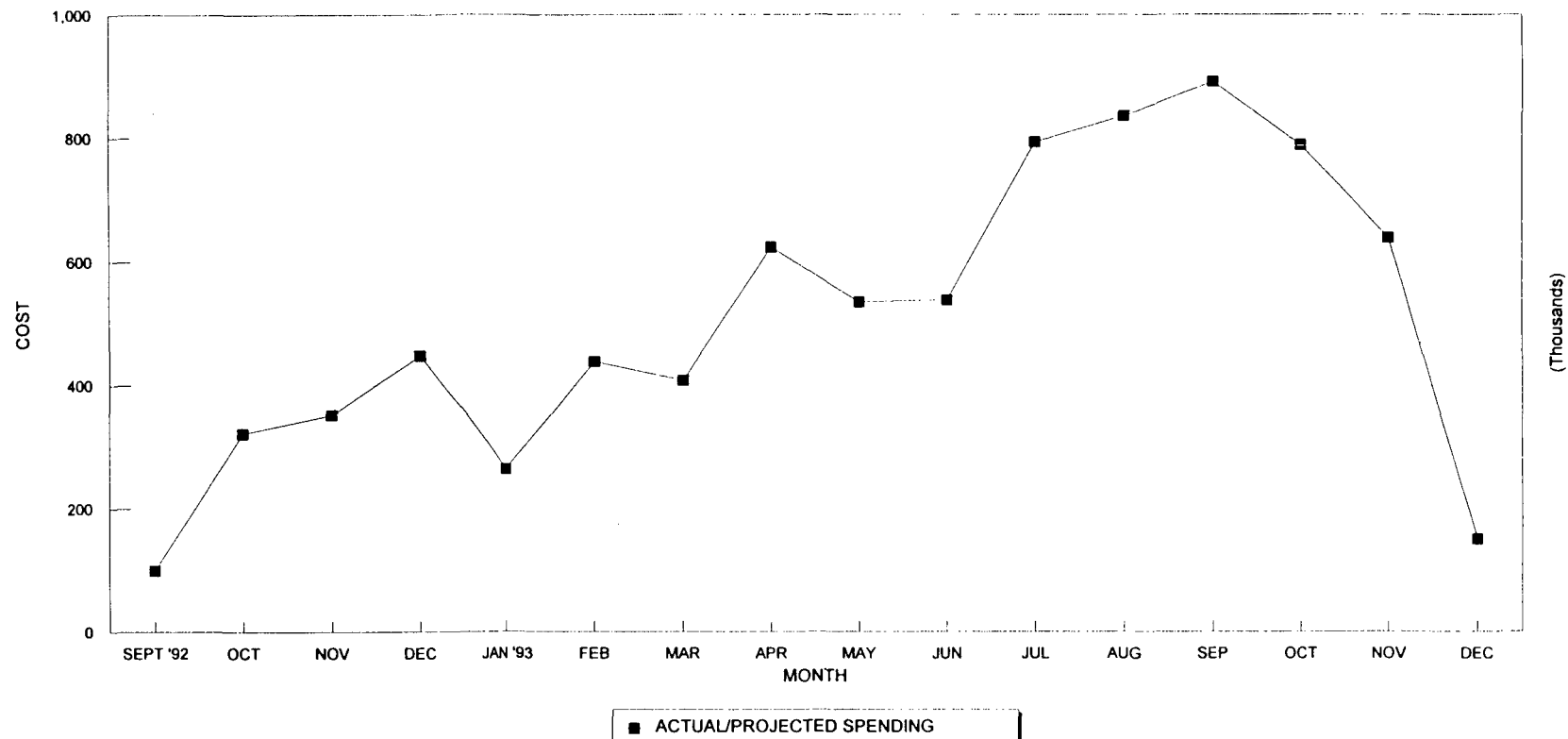
DIFFERENCE BETWEEN REVISED "BASE" BUILDING 31/32 REHABILITATION ESTIMATE AND CURRENT PROJECTED REHABILITATION COST

250,467

\* Does not include inventory value loss for non-salvageable product/raw materials.



# **BUILDING 31/32 REHABILITATION** CASH FLOW PROJECTION



# REICHHOLD CHEMICALS, INC.

COATING POLYMERS AND RESINS DIVISION

DOREMUS PLANT, NEWARK, NJ

REHABILITATION PROJECT STATUS REPORT NO. 14

## DISTRIBUTION:

R. G. Arnott	- 450A
P. D. Ashkettle	- 430A
W. R. Biddle	- 315A
W. G. Branson	- 340A
P. A. Brustofski	- 455A ;
J. C. Chang	- 450A
A. E. Dieffenbach	- Newark(D)
J. Elmo	- 330A
J. M. Evans	- 300C
J. S. Gaither	- 430A
J. L. Graham	- 455A
C. R. Hartshorn	- 410A
R. Holcombe	- 340A
F. J. Malczuk	- Newark(D)
N. J. Prato	- Newark(D)
D. E. Sartore	- 347A
A. F. Vickers	- 455A

**REICHHOLD**

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## interoffice communication

TO: DISTRIBUTION:

FROM: R. P. Aston *ms*

LOCATION: RTP

DATE: November 5, 1993

SUBJECT: **Newark-(D) Repair**  
**Status Report No. 14**

Attached is STATUS REPORT NO. 14 for the repair project at Newark-Doremus Ave.

Piping, mechanical and electrical contractor personnel as well as O'Brien and Gere construction supervision personnel were reduced at the end of October. The reason for this is to slow the remaining repair work to reduce wasted effort until the scope of further plant modifications related to product reconfiguration is well defined.

One OBG engineer has been retained for construction supervision of primarily the existing lump-sum contract work. This work should be complete by mid-December. This OBG engineer will also be utilized to supplement plant resources on project supervision, as further plant modification projects get started. Delivery of most of the Johnson-Yokogawa control system has been made and the basic configuration of the database has been completed. The balance will be delivered in early December, when the control room HVAC and ceiling has been completed.

All cost plus contract work remaining effective November 1, was transferred to the oversight of Reichhold directly. All future lump-sum contract work remaining on the project will be contracted directly by Reichhold. This has been done at this point near the end of the project to keep costs under control as further plant modification projects develop.

Details of progress and costs are attached.

# REICHHOLD CHEMICALS, INC.

DOREMUS AVENUE PLANT, NEWARK, NJ  
BLDG. 31/32 REHABILITATION PROJECT

## STATUS REPORT NO. 14

November 5, 1993

Milestones (9/15/93-10/15/93) and Projected (10/16/93-11/15/93)

### STRUCTURAL AND ARCHITECTURAL REHABILITATION

- Zack Painting has completed stripping damaged paint from doors and stairs. The surfaces have been primed. Finished painting will be held off until late November or early December to minimize construction damage.
- Barbato Construction completed rebuilding the parapet wall on the roof between buildings 31 & 32 Rau roofing completed flashing and roofing the parapet wall.
- Barbato is 99% complete with door repairs/replacements.

### MECHANICAL/PROCESS REHABILITATION

- Otis Elevator has completed installation of the passenger elevator cab and is nearing completion of the electrical repairs. They are now reporting that the elevator should be operational by November 30.
- Otis Elevator has quoted on rehabilitation of the freight elevator. Due to the high price of the Otis quote, additional quotes are being obtained during November.

- The air conditioning system for the building 32-4 west end rooms is complete except for installation of the pressurizing blower and cooling tower water piping to the unit.
- Groome Cleaning has completed the exterior decon/cleaning work, and has primed & painted the damaged surfaces. Heritage Insulation is 70% complete removing/replacing damaged piping insulation jacketing.
- The dowtherm insulation status remains unchanged. The system has been refilled with dowtherm. All damaged relief valves have been replaced, and the system is ready for start-up. Initial heat-up will be conducted by mid-November. Leak testing will be resumed at that time.
- Heritage insulation has removed approx. 70% of the asbestos insulation in the tank farm where access is needed to repair split steam tracing. Heritage is also continuing to insulate steam and condensate piping and tanks inside buildings 31/32.
- Pro-Chem is essentially complete with utilities piping and primary vacuum system piping in building 31, F5. They are continuing with process piping repair work on floors 4 & 5. They are also repairing the split steam tracings in the outside tank farms and are approx. 50% complete.
- Gerhart scale is 95% complete with the repair/replacement work on the various weigh systems and should be completed by Nov. 15.
- Custom Air Conditioning is 70% complete with the HVAC work for repair/replacement of the 31-3 Lunchroom/Lockerroom/Bathroom units, and the 31-4 QC lab and Control Room.
- A purchase order has been issued by Reichhold to ENSI for cleaning the 44% formaldehyde and butyl formcel storage tanks, and disposal of the materials. A purchase order has also been issued to ECA for disposal of the damaged organic peroxides remaining on site.
- Jackson roofing completed re-roofing Building 25 & Building 26.
- Gary Sheet Metal has been awarded the ductwork connections for the building 31/32 roof fans and exhausters. These should be completed by mid-December.
- The need for vacuum ejector system no. 2 (two-stage jet system) is still being evaluated.
- Industrial Floor Corporation has been put on hold to resurface the damaged floors of building 31 floors 3,4 & the fifth floor hot room. This work is being held off until mid-December to minimize conflicts with other work on the floors.

ELECTRICAL/I&C REHABILITATION

- Ground grid rehabilitation as of Oct 15, 1993:
  - #1/0 main riser (1st floor to fifth) installation completed.
  - #4/0 loops (5th floor) bldg. 31/32 completed.
  - Main grounding grid branches bldg. 31/32 completed.
  - Drops (#4 AWG & #6AWG) off main branches, cadweld & lug connections to existing vessels/equipment 98% complete. Final testing of system in progress.
- Conduit installation in building 31-5:
  - All main conduit runs completed.
  - Wiring & controls 90% complete.
- Conduit installation in building 32-5:
  - All main conduit runs completed.
  - Wiring & controls completed.
- Conduit installation in building 31-4:
  - Conduit runs are 90% complete.
  - Wiring & controls 50% complete.
- Conduit installation balance of buildings 31/32:
  - Existing conduit and wiring inspection/replacement is being accomplished on an as needed basis on any conduits/wiring impacted by the fire/water damage. Estimated 95% complete.
- Instrumentation and controls:
  - Termination cabinets "A", "B", "C" & "D" have been installed and "tied-in" to the raceways.
  - Intrinsically safe, analog and power raceways have been "tied-in" to the raceways.
  - Rosemount pressure transmitters, pressure-to-current converters & Drexelbrook level transmitters have been installed.
  - Bids still being evaluated for CO2 suppression and foam generation systems.
  - Simplex awarded contract for the passenger elevator smoke detection system (required by BOCA code).
  - Termination of wiring in the terminations room has begun and is approx. 10% complete.

PERMITTING

- Still waiting for R4 permit which has been re-submitted to the NJDEP.

**PROJECT BUDGET**

- O'Brien & Gere invoice no. 14 was received October 25, 1993 for costs incurred through October 15, 1993 totaling approximately \$872,000.
- Approximately \$175,000 of additional Johnson-Yokogawa invoices were also received. Approximately \$171,000 of additional JYC invoices are outstanding.
- The breakdown of the project costs expended through October 15, 1993 is as follows:

Direct bill to RCI (DCS)	\$ 529,000
Engineering	\$ 739,000
Construction Management	\$ 464,000
Construction	<u>\$5,839,000</u>
<b>Total</b>	<b><u>\$7,571,000</u></b>

- An update of the projected cash flow for the project is attached.

{BGTOCT93}

DATE:

05-Nov-93

**REICHHOLD CHEMICALS, INC.**  
**NEWARK - DOREMUS AVE. BUILDING 31/32 REHABILITATION**  
**STATUS REPORT NO. 14**

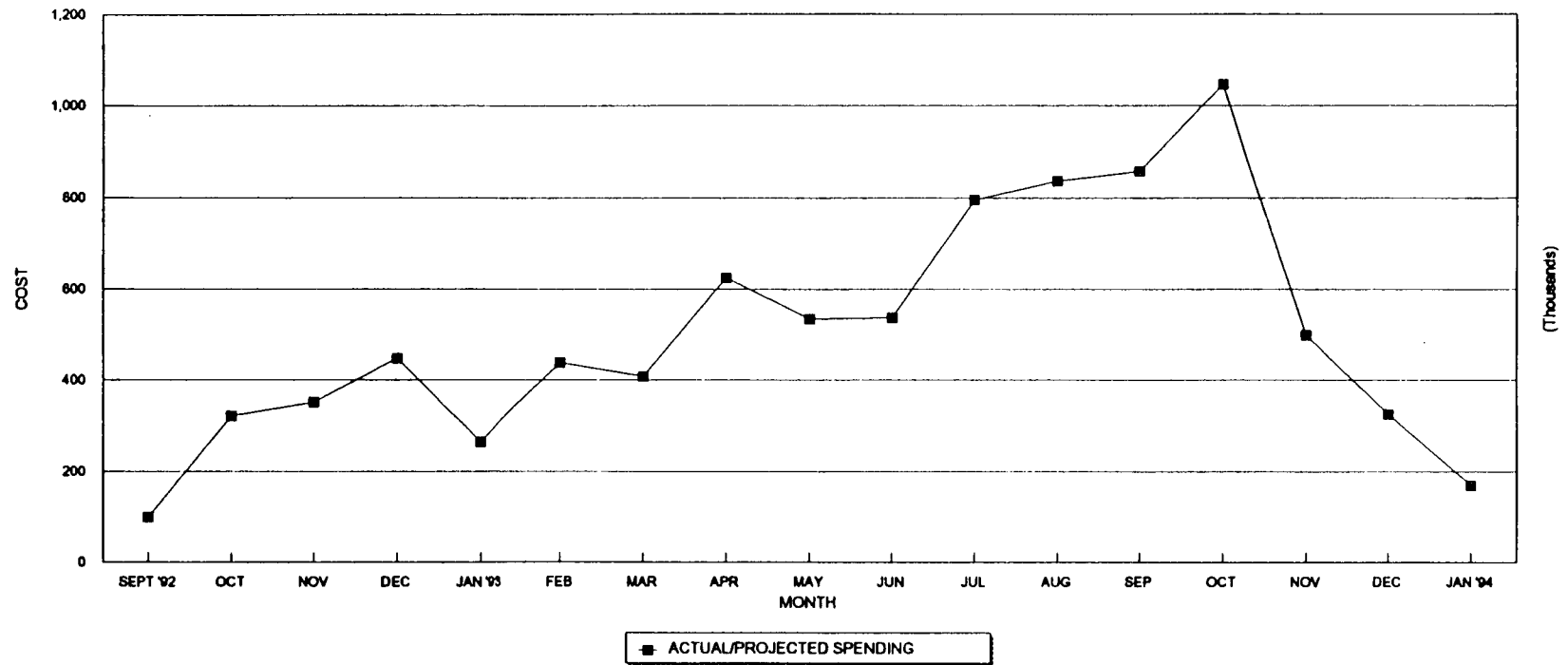
**SUMMARY OF ACTUAL AND PROJECTED COST\***

(\$)	ORIGINAL ESTIMATED COST	ACTUAL COST TO DATE	PROJECTED COST TO COMPLETE	ACTUAL + PROJECTED COST	CUMULATIVE TOTAL COST
SEPT '92		99,847		99,847	99,847
OCT		321,892		321,892	421,739
NOV		351,840		351,840	773,579
DEC		448,756		448,756	1,222,335
JAN '93		264,676		264,676	1,487,011
FEB		438,982		438,982	1,925,993
MAR		408,934		408,934	2,334,927
APR		625,048		625,048	2,959,975
MAY		535,552		535,552	3,495,527
JUN		538,551		538,551	4,034,078
JUL		794,812		794,812	4,828,890
AUG		836,503		836,503	5,665,393
SEP		858,298		858,298	6,523,691
OCT		1,047,000		1,047,000	7,570,691
NOV			500,000	500,000	8,070,691
DEC			325,000	325,000	8,395,691
JAN '94			170,000	170,000	8,565,691
<b>TOTAL</b>	<b>7,611,611</b>	<b>7,570,691</b>	<b>995,000</b>	<b>8,565,691</b>	

\* Does not include inventory value loss for non-salvageable product/raw materials,  
Phase I, II, & III costs for emergency response, clean-up and damage estimating.



# **BUILDING 31/32 REHABILITATION** CASH FLOW PROJECTION



# INSIDE REICHHOLD

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Corporate Communications Department, Research Triangle Park

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January 13, 1992

Bulletin #92-02

To All Employees:

At 11:30 p.m. Friday night, an explosion occurred at Reichhold's Doremus Avenue plant in Newark, NJ. Six employees were injured, one critically.

Preliminary indications are the explosion occurred on the fifth floor of the production facility. The resulting fire was placed under control by Newark Fire Department personnel by 1:30 Saturday morning.

Of the injured, one employee has been hospitalized in critical condition; three employees are being treated for cuts and abrasions and two others were treated for abrasions and released.

The company cannot speculate as to the cause of the incident until a thorough review is conducted. Of primary concern, presently, is the care of our injured personnel.

Damage to the production building can be described as extensive. There are no reports of damage outside the Reichhold plant, and all material was contained on-site. All appropriate agencies, including the EPA, DEP, OSHA and U.S. Coast Guard were notified.

Production at the plant has stopped. Coating Polymers and Resins Division manufacturing and sales and marketing personnel met yesterday to arrange the transfer of production to other company facilities. Presently, no determination can be made regarding the plant's future production status.

Approximately 70 people are employed at the 10 acre facility, which produces resins for use in coatings such as paints and varnishes. The facility was acquired by Reichhold from Spencer-Kellogg in September of 1989.

Any media inquiries regarding the incident should be referred to corporate communications in Research Triangle Park, NC.

**Reichhold Chemicals, Inc.**  
Coating Polymers & Resins Division  
400 Doremus Avenue  
Newark, NJ 07105

**REICHHOLD**

HAND DELIVERED

January 29, 1992

Chialing Ting, Civil Engineer  
US Environmental Protection Agency  
Region II Technical Assistance Team  
Roy F. Weston, Inc.  
1090 King Georges Post Road  
Suite 201  
Edison, NJ 08837

Dear Mr. Ting:

Per your request, a narrative description of site activities to date follows.

A fire and explosion occurred at Reichhold Chemicals' Newark Doremus facility on January 10th of this month. Immediately following the incident, facility personnel, with assistance from American Industrial Marine Services, secured the site by removing standing fire run-off water from both inside and outside of the building, as well as barricading the surroundings, and restricting access to the facility.

Subsequent activities include:

- Supporting investigative efforts of various agencies including: BATF, NJDEP, USEPA, OSHA, Essex County Prosecutors Office, NJDOH, Newark Police Department, Newark Fire Department, USCG, etc.
- A structural assessment by O'Brien and Gere.
- Barricading of unsafe areas including open shafts, structurally unsound areas, etc.
- Removal of hanging debris (window frames). [Ongoing]
- Creation of an access point to the 32-5 area by removal of a portion of the curtain wall.
- Removal of approximately 400 drums of flammable and combustible resin products to create a staging area within the building for wastes, etc., salvage saleable products, and minimize fire loading.
- Removal of the organic peroxides from 32-5.

(201) 589-3709  
(201) 817-9173 (Facsimile)

page 2  
Chialing Ting  
January 29, 1992

- Overpacking and removal of 6 bulged drums of 2-hydroxyethylacrylate from 31-5 and 32-5.
- Staging of a 20,000 gallon portable tank to handle contaminated/potentially contaminated waters removed from the building.
- Removal of standing water from 32-5 and 31-5. [Ongoing]
- Removal of standing water from the freight elevator shaft.
- Establishment of dikes in the first floor area to prevent runoff through various doorways.
- Reestablishment of the floor drain system, and draining of the 6,000 gallon catch tank on the first floor. [Ongoing]

Activities for today, January 29 will include:

- Emptying and inhibiting a reactive monomer mixture (2-hydroxyethyl acrylate, styrene, glacial acrylic acid, methyl methacrylate, est. volume 3,000 gallons) from T119.

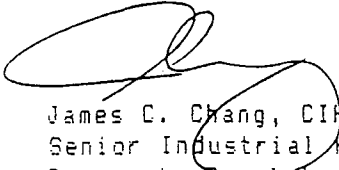
Future activities are anticipated to include:

- Receipt of shoring materials for 32-5.
- Installation of shoring with concurrent material removal from 32-5.

This concludes the description of activities on site from the period January 12 - 28.

Please advise if you require additional information or have any questions.

Sincerely,



James C. Chang, CIH  
Senior Industrial Hygienist  
Corporate Regulatory Affairs

February 7, 1992

N.J.D.E.P.E.  
Bureau of Discharge Prevention  
401 East State Street  
CN 027  
Trenton, New Jersey 08625 - 0027

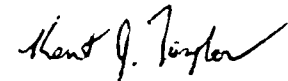
RE: N.J.D.E.P.E. Spill Case # 92-1-11-0147-00  
National Response Center Case # 102412

Gentlemen:

Attached hereto is the confirmation report to meet the requirements in N.J.A.C. 7:1E-5.8(b), for the release reported under the above listed case numbers. Also enclosed is an affidavit, in accordance with N.J.A.C. 7:1E-5.6(b), that the notification made was as immediate as possible under the circumstances in which the discharge occurred.

Should you require further information, please feel free to contact me at (201)589-3709.

Very truly yours,

  
Kent Taylor  
Plant Manager

KT/jr

Attachments

842899825

**Reichhold Chemicals, Inc.**

Corporate Headquarters  
P.O. Box 13582  
Research Triangle Park, NC 27709-3582

**REICHHOLD**

February 7, 1992

N.J.D.E.P.E.  
Bureau of Discharge Prevention  
401 East State Street  
CN 027  
Trenton, New Jersey 08625 - 0027

RE: N.J.D.E.P.E. Spill Case # 92-1-11-0147-00  
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Should you require further information, please feel free to contact me at (201)589-3709.

Very truly yours,



Kent Taylor  
Plant Manager

KT/jr

Attachments

**REICHOLD CHEMICALS, INC.**

Newark, New Jersey

**Justification for Delay of Notification of Discharge**  
N.J.A.C. 7:1E-5.6(b)**1. Facility Address:**

Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, N.J. 07105

**2. Date and time discharge began and ended:**

The release resulted from an explosion and fire which occurred at approximately 11:30 p.m. on January 10, 1992. The fire was brought under control at about 1:30 a.m., January 11, 1992; cardboard packaging material continued to smoulder until about 4:30 a.m. that morning.

**3. Person discovering discharge:**

The supervisor on duty was -

Mr. E. Zglobicki, Shift Supervisor  
Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey 07105  
(201) 589-3709

**4. Date, time, circumstance when release discovered:**

See item 2 above

**5. Reasons for discharge not immediately discovered:**

Not applicable

**6. Date and time discharge first reported:**

The release was reported to the N.J.D.E.P.E. at approximately 1:30 a.m., January 11, 1992.

7. **Person who notified the Department:**

David W. Bright  
Reichhold Chemicals, Inc.  
2400 Ellis Road  
Durham, N.C. 27703-5543  
(919) 990-7570

8. **Reason for notification delay:**

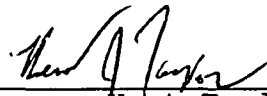
Notification of the N.J.D.E.P.E. within 15 minutes of the explosion/fire was impossible or unreasonable because all employees at the site were either; (1) too severely injured, (2) searching for or responding to severely injured employees, or (3) involved with emergency response activities.

9. **Demonstration notification was made as soon as reasonable:**

The N.J.D.E.P.E. was called as soon as the emergency activities listed in Number 8 above were completed, within 90 minutes of the beginning of the accident.

**CERTIFICATION:**

I certify, under penalty of law, that the information provided in this document is true, accurate and complete to the best of my knowledge and belief. I am aware that there are significant civil and criminal penalties, including fines or imprisonment or both, for submitting false, inaccurate or incomplete information.



---

Kent Taylor  
Plant Manager



**REICHOLD CHEMICALS, INC.**

Newark, New Jersey

Confirmation Report

N.J.A.C. 7:1E-5.8

**Case Numbers:**

N.J.D.E.P.E. # 92-1-11-0147-00

National Response Center # 10242121

**1. Person Reporting Discharge**

David W. Bright  
Reichhold Chemicals, Inc.  
2400 Ellis Road  
Durham, N. C. 27703-5543  
(919) 9990-7570

**2. Person submitting this report:**

Mr. Kent Taylor  
Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey 07105  
(201) 589-3709

**3. Information for party responsible for reporting, if report made by third party:**

Not Applicable

**4. Person responsible for discharge:**

Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey 07105

**5. Facility owner and operator:**

Same as 4 above.

**6. Source of discharge:**

A fire/explosion occurred in buildings 31/32 which are separated by a fire wall. The fire is believed to have started on the fifth floor of building 31. Investigations into the exact cause are on-going, but it is known that the manhole cover of a monomer addition tank containing approximately 4,000 pounds of n-butyl acrylate monomer was blown off, and that fire was intense in this area.

Investigations to date have not revealed other possible sources for the explosion.

**7. Location of discharge:**

Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey 07105  
(201) 589-3709

**7.i. Location if discharge continued:**

Tax Lot Number: 5070  
Tax Block Number: 011  
County: Essex  
Facility E.P.A I.D. #: NJDO92217892

**7.ii. Body of Water**

Confluence of the Passaic River and Newark Bay  
Latitude 40 deg. 43 min. 12 sec.  
Longitude 74 deg. 7 min. 30 sec.

**8. Hazardous substance discharged:**

The following is a list of chemicals that were stored on the fifth floor of buildings 31/32, that may have been released during the fire. Most of this material was in powder form and was stored in bags, fiber drums, or "supersacks". Some of the containers burned in the fire and the powdered materials have spilled onto the floor and have been washed onto the other floors by the sprinkler system.

COMMON NAMEC.A.S. NUMBER

N-Butyl Acrylate	141-31-2
Azoisobutyronitrile	78-67-1
Hydrocarbon Resin	68131-87-3
Hexamethylenetetramine	100-97-0
Melamine	108-78-1
Hydrogenated Diphenylolpropane	unknown
Methacrylic Acid	79-41-4
Trimethylolethane	77-85-0
Fatty Acids C16-C19	67701-03-5
Phenolic Resin	54579-447-1
Betaprene BC115D Hydrocarbon Resin	unknown
Urea	57-13-6
Pentaerythritol	115-77-5
Phthalic Anhydride	85-44-9
Maleic Anhydride	108-31-6
Trimellitic Anhydride	552-30-7
Paraformaldehyde	30525-89-4
P-Tert Butyl Benzoic Acid	98-73-7
Benzoic Acid	65-85-0
Ortho-Para Toluene Sulfonamide	8013-74-9
Chlorendic Anhydride	115-27-5
N-Pelargonic Acid	112-05-0
Benzoquanamine	unknown
Polyethylene Glycol	25322-68-3
Adipic Acid	124-04-9
Bisphenol A	80-05-7
Trimethylolpropane	77-99-6
Neopentyl Glycol	126-30-7
Polyester Resin Solution	mixture
Alkyd Resin Solution	mixture
Maleinized Oil Resin Solution	mixture
Diatomaceous Earth	68855-54-9

9. **Quantities of hazardous substances discharged:**

Accurate quantities of a hazardous substances released cannot be determined, because of restrictions on access to the affected area. As mentioned above, bagged material was damaged by fire and the sprinkler system. Some of it was washed onto the floor, and mixed together. There may have been up to 600,000 pounds of raw materials in bags and fiber drums. For preliminary purposes, it can be estimated that approximately 10 percent of the material stored in bags and fiber drums was released within the building. Several drums of resin stored near Tank 125 and most of the contents of Tank 125 were released onto the fifth floor. Tank 125 contained a n-butyl acrylate monomer. An estimated 50-100 gallons of this resin sprayed out of the building onto the driveway below.

There is considerable structural damage on the fifth floor which must be corrected before a full assessment can be made. Shoring of the roof is in progress and should be completed by March 1, 1992. A supplemental report will be issued when information becomes available.

Water used to extinguish the fire washed out of the building and into the asphalt parking lot. About 15,000 gallons of this water was collected in 3 tanker trucks. This water was analyzed and found to be free of contaminants that would require it to be disposed of as a hazardous waste. Analysis of this water was performed by Accredited Laboratories of Carteret, N.J. for priority pollutants and T.C.L.P. Copies of the analytical reports are attached hereto. The water was disposed of at Waste Conversion, Inc. in Hatfield, Pennsylvania. Waste Conversion is an authorized treatment facility for hazardous and non-hazardous aqueous waste streams.

An unknown volume of water washed through storm drains into the Passaic River at the east end of the property. This was brought to the attention of D.E.P.E. and E.P.A. responders by plant personnel. Upon observation, no sheen was present and it was concluded that no action was required.

A fourth tanker truck was filled with water from the first floor of building 31, from elevator shafts and from a tank used to collect raw process water. Removal of water from Tank-66 on the first floor allowed some water from upper floors to drain into the tank for containment. This water was initially thought to be non-hazardous, but upon receipt at Waste Conversion was found to have a flash point of 55 degrees Fahrenheit. It was reshipped directed to Delaware Container, Inc. for disposal as a hazardous waste. A copy of the manifest is attached.

#### 10. Reporting Chronology:

The fire/explosion occurred at about 11:30 p.m. Friday, January 10, 1992. It was brought under control by 1:30 a.m. on January 11th. Cardboard packaging material continued to smoulder for several more hours, but was extinguished by 4:30 a.m. Initial notification was made to the D.E.P.E. and the National Response Center at approximately 1:00 a.m.

**11. Containment/Clean-up measures:**

Emergency response contractors were on-site at sunrise on January 11th to contain water which had collected in the parking lot. The water was stored in tanker trucks pending laboratory analysis. Laboratory analysis and proof of disposal for this water are attached. As reported in #9 above, approximately 50-100 gallons of an extremely viscous resinous substance was sprayed onto the parking lot outside the building. This material has solidified and cannot be removed using normal means. An attempt to remove this substance will be made when the area is declared safe. Hanging window frames and other debris currently make the area unsafe to work in. The area is being stabilized.

It is assumed that considerable amounts of debris will be generated when building clean-up beings. The regulatory status of such materials will be determined after the shoring is complete and the inventory can be further evaluated.

It is not possible to estimate total response costs at this time. This information will be provided in a supplemental report.

**12. Corrective actions taken:**

The plant is not in operation due to considerable damage to the production building. Corrective actions will be instituted prior to start-up of manufacturing at the facility. These will be based on reports from forensic engineers, Reichhold engineers and OSHA.

**13. Additional measures taken to prevent recurrences:**

See #12 above.

**14. Entities involved in clean-up:**

Advanced Environmental Technologies, Inc.  
1 Eden Lane  
Flanders, N.J.  
(201) 347-7111

American Industrial Marine Services, Inc.  
P.O. Box 4048  
Dunellen, N.J.  
(908) 756-5200

O.H.M. Corporation  
16406 U.S. Route 224E  
Findlay, Ohio 45840  
(800) 537-9540

O'Brien and Gere Engineering  
P.O. Box 80308  
Raleigh, N.C. 27623  
(919) 469-0099

Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, N.J. 07105  
(201) 589-3709

**15. Quantity, location, and date of samples:**

In order to obtain a representative sample of waste water, samples were taken in two areas of the parking lot, as well as from each of the tanker trucks used for storage of this water. This water was analyzed for priority pollutants, and T.L.C.P. constituents. Copies of reports are attached.

Analytical results for the resinous substance are also attached.

**16. Results of analysis:**

See #15 ABOVE

**17. Financial responsibility certification:**

I certify under penalty of law that the financial responsibility demonstrated pursuant to N.J.A.C. 7:1E4.5 and submitted to the Department pursuant to N.J.A.C. 7:1E4.4(a)9 is in full force and effect.

  
\_\_\_\_\_  
Kent Taylor  
Plant Manager

**18. Supplemental information:**

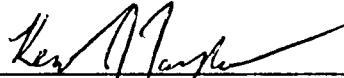
Not applicable

**19. Other information requested by N.J.D.E.P.E.**

Not applicable

**20. CERTIFICATION:**

I certify, under penalty of law, that the information provided in this document is true, accurate and complete to the best of my knowledge, information, and belief. I am aware that there are significant civil and criminal penalties, including fines or imprisonment or both, for submitting false, inaccurate or incomplete information.



---

Kent Taylor  
Plant Manager

**Reichhold Chemicals, Inc.**

Corporate Headquarters

P.O. Box 13582

Research Triangle Park, NC 27709-3582

**REICHHOLD**

February 5, 1992

Bureau of Discharge Prevention  
New Jersey Department of Environmental Protection  
CN 027  
Trenton, New Jersey 08625-0027

ATTENTION: Plan Submittal

RE: Reichhold Chemicals, Inc. - Newark, New Jersey  
DPCC and DCR Plans - Financial Assurance Submittal

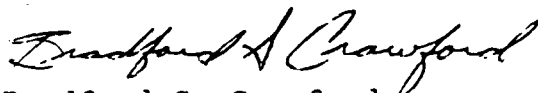
Dear Sir:

The Reichhold Chemicals, Inc. facility located on Doremus Avenue in Newark, New Jersey is required to submit a DPCC plan and a DCR plan by August 1, 1992 in accordance with N.J.A.C. 7:1E-4.6(b)2.

The facility experienced a release due to an explosion/fire on January 10, 1992. In order to comply with the confirmation report requirement in N.J.A.C. 7:1E-5.8(b)17., the enclosed insurance certificates are being submitted to demonstrate financial responsibility. The complete DPCC and DCR plans will be submitted consistent with N.J.A.C. 7:1E-4.6(b)2. at a later date.

If you have any questions concerning this submittal, please call me at (919) 990-7540.

Sincerely,



Bradford S. Crawford  
Regional Environmental Engineer  
Environmental Engineer

BSC/jwr

Enclosures



## TEECHES INSURANCE LIMITED

Victoria Hall, Victoria Street  
P.O. Box HM 1826  
Hamilton HM HX, Bermuda  
Tel: (809)292-4402 Telex: 3276 Kero BA  
Fax: (809)292-1563

CERTIFICATE OF INSURANCE

Name: Reichhold Chemicals Inc.

Address: 400 Doremus Avenue  
Newark, NJ 07105  
U.S.A.

Policy Number: 1-10001-03

Policy Period: March 31, 1991 to March 31, 1992

Insurer: Teeches Insurance Limited

Address: P. O. Box HM 1826  
Hamilton HM HX  
Bermuda

Insured: Reichhold Chemicals Inc.

Address: 800 Capitola Drive  
Durham, NC 27709  
U.S.A.

1. Teeches Insurance Ltd. the Insurer as identified above, hereby certifies that it has issued liability insurance covering the following facility: Reichhold Chemicals Inc., 400-Doremus Avenue, Newark NJ 07105 for taking corrective action caused by discharges arising from operating the facility identified above.

The limits of liability are Sudden and Accidental Pollution \$1,000,000 per occurrence and \$2,000,000 annual aggregate, exclusive of legal defense costs. This coverage provided under Policy No. 1-10001-03. The effective date of said policy is March 31, 1991.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
- a. Bankruptcy or insolvency of the insured shall not relieve the Insurer or its obligations under the policy to which this certificate applies.
  - b. The Insurer is liable for the payment of amounts within any deductible applicable to the policy to the provider of corrective action, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms.
  - c. Whenever requested by the Department, the Insurer agrees to furnish to the Department a signed duplicate original of the policy and all endorsements.
  - d. Cancellation or any other termination of the insurance by the Insurer will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the insured or 60 days after a copy of such written notice is received by the insured or 60 days after a copy of such written notice is received by the Department whichever is later.
  - e. The insurance covers claims for any occurrence that commenced during the term of the policy that is discovered and reported to the Insurer within six months of the effective date of the cancellation or other termination of the policy.

I hereby certify that the wording of this instrument is identical to the wording in Appendix B of N.I.A.C. 7:1E and that the Insurer is licensed to transact the business of insurance in the State.

IN WITNESS WHEREOF, TEECHES INSURANCE LIMITED has caused this Certificate to be signed by an authorized officer at Hamilton, Bermuda.

Date

January 24, 1992

for Teeches Insurance Limited

## TEECHES INSURANCE LIMITED

Victoria Hall, Victoria Street  
P.O. Box HM 1826  
Hamilton HM HX, Bermuda  
Tel: (809)292-4402 Telex: 3276 Kero BA  
Fax: (809)292-1563

ENDORSEMENT NO. 4

Effective Date: February 1, 1992

Name: Reichhold Chemicals Inc.

Address: 400 Doremus Avenue  
Newark, NJ 07105  
U.S.A.

Policy Number: 1-10001-03

Policy Period: March 31, 1991 to March 31, 1992

Insurer: Teeches Insurance Limited

Address: P. O. Box HM 1826  
Hamilton HM HX  
Bermuda

Insured: Reichhold Chemicals Inc.

Address: 800 Capitola Drive  
Durham, NC 27709  
U.S.A.

1. This endorsement certifies that the policy to which the endorsement is attached provides liability insurance covering the following facility: Reichhold Chemicals Inc., 400 Doremus Avenue, Newark, NJ 07105, U.S.A. for taking corrective action caused by discharges.

The limits of liability are Sudden and Accidental Pollution \$1,000,000 per occurrence and \$2,000,000 annual aggregate, exclusive of legal defense costs. This coverage provided under Policy No. 1-10001-03. The effective date of said policy is March 31, 1991.

2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy provided, however, that any provisions inconsistent with subsections (a) through (e) of this Paragraph 2 and hereby amended to conform with subsections (a) through (e):
- a. Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.
  - b. The Insurer is liable for the payment of amounts within any deductible applicable to the policy to the provider of corrective action, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms.
  - c. Whenever requested by the Department, Teeches Insurance Limited agrees to furnish to the Department a signed duplicate original of the policy and all endorsements.
  - d. Cancellation or any other termination of the insurance by the Insurer will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the insured or 60 days after a copy of such written notice is received by the insured or 60 days after a copy of such written notice is received by the Department whichever is later.
  - e. The insurance covers claims for any occurrence that commenced during the term of the policy that is discovered and reported to the Insurer within six months of the effective date of the cancellation or termination of the policy.

I hereby certify that the wording of this instrument is identical to the wording in Appendix B of N.I.A.C. 7:1E and that the Insurer is licensed to transact the business of insurance in New Jersey.

IN WITNESS WHEREOF, TEECHES INSURANCE LIMITED has caused this endorsement to be signed by an authorized officer at Hamilton, Bermuda.

Date

January 24, 1992

for Teeches Insurance Limited

001239/BES/2

**Reichhold Chemicals, Inc.**  
Coating Polymers & Resins Division  
400 Doremus Avenue  
Newark, NJ 07105

**REICHHOLD**

February 11, 1992

N.J.D.E.P.E.  
Bureau of Discharge Prevention  
401 East State Street  
CN 027  
Trenton, New Jersey 08625-0027

RE.: N.J.D.E.P.E. Spill Case # 92-1-11-0147-00  
National Response Center Case # 102412

Gentlemen:

Attached are the lab analyses and copy of the waste manifest referred to in the spill report of February 7, 1992.

Should you require further information, please feel free to contact me at (201) 589-3709.

Sincerely,

  
~~Kent Payton~~  
Plant Manager

KT/glm  
attachments

cc: R. Naujelis

**Accredited Laboratories, Inc.**

Foot of Pershing Avenue, P.O. Box 369  
Carteret, New Jersey 07008-0369  
Telephone: (908) 541-2025

**ANALYTICAL DATA REPORT**

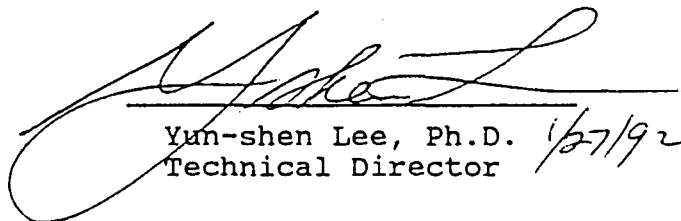
for

**Reichold Chemical**  
400 Doremus Avenue  
Newark, NJ 07101

ACCREDITED LABORATORIES CASE No.: 9121  
DATE RECEIVED: 1/22/92

<u>Field ID</u>	<u>Laboratory</u> <u>Sample #</u>
1-6	9200362

Accredited Laboratories, Inc. New Jersey Certification Number  
12486. This data has been reviewed and accepted by:

  
Yun-shen Lee, Ph.D. 1/27/92  
Technical Director

YSL:JP

ACCREDITED LABORATORIES, INC.  
\*TCLP/VO ANALYSIS DATA

NUMBER  
E NUMBER  
DATA FILE  
CLIENT NAME  
FIELD ID

9121  
9200362  
C4708  
RC  
1-6

MATRIX  
DILUTION FACTOR  
DATE EXTRACTED  
DATE ANALYZED  
ANALYZED BY

Leachate  
5.00  
  
01/23/92  
PAUL

COMPOUND	UG/L	MDL
Benzene	U	25
2-Butanone	434	50
Carbon Tetrachloride	U	25
Chlorobenzene	U	25
Chloroform	U	25
1,1-Dichloroethene	U	25
1,2-Dichloroethane	U	25
Tetrachloroethene	U	25
Trichloroethene	U	25
Vinyl Chloride	U	50

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
1,2-Dichloroethane-d4	88.4 %	76 - 114	OK
Toluene-d8	97.5 %	88 - 110	OK
Bromofluorobenzene	91.8 %	86 - 115	OK

(J) Indicates detected below MDL

(U) Indicates compound analysed for but not detected

(B) Indicates analyte found in both the blank and sample

(D) Indicates a secondary dilution

\* The concentration of each compound was calculated based on TCLP spike recoveries.

ACCREDITED LABORATORIES, INC  
TCLP PESTICIDE ANALYSIS DATA

CASE NUMBER	9121
SAMPLE NUMBER	9200362 TCLP P/P
DATA FILE	>A3159
CLIENT NAME	RC
FIELD ID	1-6

MATRIX	Leachate
DILUTION FACTOR	2.50
DATE EXTRACTED	01/23/92
DATE ANALYZED	01/23/92
ANALYZED BY	CARLOS

COMPOUND	UG/L	MDL
Lindane	U	.13
Heptachlor	U	.13
Heptachlor Epoxide	U	.13
Endrin	.09(J)	.25
Methoxychlor	U	2.50
A-Chlordane	U	1.25
G-Chlordane	U	1.25
Toxaphene	U	2.50

(J) Indicates detected below MDL

(U) Indicates compound analyzed for but not detected

Note - Analytical results corrected based on sample matrix spike recoveries



ACCREDITED LABORATORIES, INC  
TCLP HERBICIDE ANALYSIS DATA

CASE NUMBER	9121
SAMPLE NUMBER	9200362
DATA FILE	>ED377
CLIENT NAME	RC
FIELD ID	1-6

MATRIX	Leachate
DILUTION FACTOR	200.0
DATE EXTRACTED	01/24/92
DATE ANALYZED	01/24/92
ANALYZED BY	CARLOS

=====		
COMPOUND	UG/L	MDL
=====		
2,4-D	U	200
SILVEX	U	20.0

(J) Indicates detected below MDL

(U) Indicates compound analyzed for but not detected

Note - Analytical results corrected based on sample matrix spike recoveries

ACCREDITED LABORATORIES, INC  
TCLP PCB ORGANIC ANALYSIS DATA

CASE NUMBER	9121
SAMPLE NUMBER	9200362 TCLP P/P
DATA FILE	>G0601
CLIENT NAME	RC
FIELD ID	1-6

MATRIX	Leachate
DILUTION FACTOR	2.50
DATE EXTRACTED	01/23/92
DATE ANALYZED	01/23/92
ANALYZED BY	CARLOS

CAS#	COMPOUND	UG/L	MDL
12674112	Aroclor-1016	U	2.5
11104282	Aroclor-1221	U	2.5
11141165	Aroclor-1232	U	5.0
53469219	Aroclor-1242	U	2.5
12672296	Aroclor-1248	U	2.5
11097691	Aroclor-1254	U	2.5
11096825	Aroclor-1260	U	2.5

- (J) Indicates detected below MDL  
(U) Indicates compound analyzed for but not detected  
(B) Indicates analyte found in both the blank and sample  
(D) Indicates a secondary dilution

Accredited Laboratories, Inc.  
TCLP Metals

Case No.: 9121  
Sample No.: 9200362  
Field ID: 1-6  
Client: RC

Matrix: Extract  
Date Received: 01/22/92  
Date Extracted: 01/22/92  
Date Digested: 01/22/92  
(Hg): 01/24/92

Parameters	Results ug/L	MDL ug/L	Date of Analysis
Arsenic	ND	1000	01/24/92
Barium	5880	500	01/27/92
Cadmium	ND	30	01/24/92
Chromium	32	30	01/24/92
Lead	ND	300	01/24/92
Mercury	ND	1.00	01/27/92
Selenium	ND	500	01/24/92
Silver	ND	300	01/27/92

Quality Control Number: 920108T

\* Analytical results corrected based on sample matrix  
spike recoveries.

ACCREDITED LABORATORIES, INC  
TCLP/BNA ORGANIC ANALYSIS DATA

CASE NUMBER 9121  
 SAMPLE NUMBER 9200362  
 DATA FILE 87959  
 CLIENT NAME RC  
 FIELD ID 1-6

MATRIX Leachate  
 DILUTION FACTOR 5.00  
 DATE EXTRACTED 1/23/92  
 DATE ANALYZED 01/23/92  
 ANALYZED BY JOHN

COMPOUND	UG/L	MDL
2-Methylphenol	64	50
3-Methylphenol	25(J)	50
4-Methylphenol	23(J)	50
1,4-Dichlorobenzene	U	50
Hexachloroethane	U	50
Nitrobenzene	U	50
Hexachlorobutadiene	U	50
2,4,6-Trichlorophenol	U	50
2,4,5-Trichlorophenol	U	250
Pentachlorophenol	U	250
2,4-Dinitrotoluene	U	50
Hexachlorobenzene	U	50
Pyridine	U	50

\* 2-Methylphenol = o-cresol.

\* 3-Methylphenol = m-cresol.

\* 4-Methylphenol = p-cresol.

\* The concentration of each compound was calculated based on TCLP spike recoveries.

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
2-Fluorophenol	63.8 %	21 - 100	OK
Phenol-d5	44.8 %	10 - 94	OK
Nitrobenzene-d5	62.3 %	35 - 114	OK
2-Fluorobiphenyl	65.2 %	43 - 116	OK
2,4,6-Tribromophenol	55.8 %	10 - 123	OK
Terphenyl-d14	55.2 %	33 - 141	OK

(J) Indicates detected below MDL

(U) Indicates compound analysed for but not detected

(B) Indicates analyte found in both the blank and sample

(D) Indicates a secondary dilution

\*\* 3-Methylphenol and 4-methylphenol can not be separated by the method applied.

Accredited Laboratories, Inc.

Foot of Pershing Avenue, P.O. Box 369  
Caneriet, New Jersey 07008-0369  
Telephone: (908) 541-2025

Client: REICHOLD CHEMICAL Project: \_\_\_\_\_  
Address: 400 DOREMUS AVE. Contact: MIKE BAXI  
City: NEWARK Phone: (201) 589-3709  
P.O. Number \_\_\_\_\_ State, Zip: NJ, \_\_\_\_\_ Fax: \_\_\_\_\_

\*\* M = Matrix (A)=Aqueous (S)=Soil (G)=Sludge (P)=Potable Water (O)=Oil  
(F)=Filter (K)=Solid (X)=Other \_\_\_\_\_

\* C = No. Containers

Deliverables (circle one): STD Tier I Tier II ECRA Other \_\_\_\_\_

Turnaround: 72 HRS.  
(if blank, std applies)

ALI Sample No.	Field ID	C*	M**	Date/Time SAMPLED	Sample Description	Analyses
9200362	1	1	A	1/22/92 2:45 PM	FIRE WATER TANK	BNA
	2	1	A			HERBICIDES
	3	1	A			PCBs
	4	1	A			PESTICIDES
	5	1	A			METALS
	6	2	A			VOs

Person(s) Assuming Responsibility for Sampling: Print M. Baxi - M. BAXI Sign Mike Baxi

Relinquished By: print	Relinquished By: sign	Received By: print	Received By: sign	Organization	Date	Time	Reason
MIKE BAXI	Mike Baxi	T. Breathwhite	T. Breathwhite	ALI	1/22/92	3:00 PM	Analysis
T. Breathwhite	T. Breathwhite	L. Simko	L. Simko	AU	1/22/92	3:54 PM	Analyzed

Comments: \_\_\_\_\_

C-9121

842899848

**Accredited Laboratories, Inc.**

Foot of Pershing Avenue, P.O. Box 369  
Carteret, New Jersey 07008-0369  
Telephone: (908) 541-2025

**ANALYTICAL DATA REPORT**

for

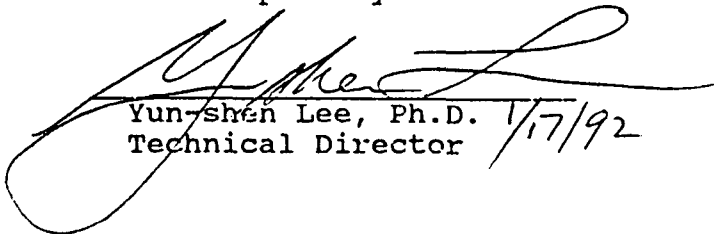
**American Industrial Marine Services**  
1630 S. 2nd Street  
Plainfield, NJ 07060

**Project: Reichhold Chemicals**

**ACCREDITED LABORATORIES CASE No.: 9061**  
**DATE RECEIVED: 1/13/92**

<u>Field ID</u>	<u>Laboratory Sample #</u>
#1	9200183
#2	9200184
#3	9200185

Accredited Laboratories, Inc. New Jersey Certification Number  
12486. This data has been reviewed and accepted by:

  
Yun-Shen Lee, Ph.D.  
Technical Director 1/17/92

YSL:jfp

842899850

ACCREDITED LABORATORIES, INC  
VOLATILE ORGANIC ANALYSIS DATA

CASE NUMBER 9061  
SAMPLE NUMBER 9200183  
DATA FILE >C4568  
CLIENT NAME AIMS 1/5  
FIELD ID #1

MATRIX Aqueous  
DILUTION FACTOR 5.00  
DATE EXTRACTED  
DATE ANALYZED 01/13/92  
ANALYZED BY PAUL

Cas #	Compound	UG/L	MDL	Cas #	Compound	UG/L	MDL
107028	Acrolein	U	250	78875	1,2-Dichloropropane	U	25
107131	Acrylonitrile	U	25	10061015	cis-1,3-Dichloropropene	U	25
74873	Chloromethane	U	50	79016	Trichloroethene	U	25
74839	Bromomethane	U	50	71432	Benzene	19(J)	25
75014	Vinyl Chloride	U	50	124481	Dibromochloromethane	U	25
75003	Chloroethane	U	50	79016	1,1,2-Trichloroethane	U	25
75092	Methylene Chloride	9(J)	25	10061026	trans-1,3-Dichloropropene	U	25
67641	Acetone	120	50	110758	2-Chloroethylvinylether	U	50
75150	Carbon Disulfide	U	25	75252	Bromoform	U	25
75694	Trichlorofluoromethane	U	50	591786	2-Hexanone	U	50
75354	1,1-Dichloroethene	U	25	108101	4-Methyl-2-pentanone	U	50
75353	1,1-Dichloroethane	U	25	127184	Tetrachloroethene	U	25
75355	trans-1,2-Dichloroethene	U	25	79345	1,1,2,2-Tetrachloroethane	U	25
67653	Chloroform	U	25	108883	Toluene	77	25
107062	1,2-Dichloroethane	U	25	108907	Chlorobenzene	U	25
78933	2-Butanone	42(J)	50	100414	Ethylbenzene	232	25
71556	1,1,1-Trichloroethane	U	25	100425	Styrene	U	25
56235	Carbon Tetrachloride	U	25	1330207	m,p-Xylene	669	25
108054	Vinyl Acetate	U	50	95476	o-Xylene	213	25
75274	Bromodichloromethane	U	25	156592	cis-1,2-Dichloroethene	U	25

<u>SURROGATE COMPOUNDS</u>	<u>RECOVERY</u>	<u>LIMITS</u>	<u>STATUS</u>
1,2-Dichloroethane-d4	102.4 %	76 - 114	OK
Toluene-d8	106.6 %	88 - 110	OK
Bromofluorobenzene	99.6 %	86 - 115	OK

(J) Indicates detected below MDL

(U) Indicates compound analysed for but not detected

(B) Indicates analyte found in both the blank and sample

(D) Indicates a secondary dilution

ACCREDITED LABORATORIES, INC  
VOLATILE ORGANIC ANALYSIS DATA

CASE NUMBER 9061  
SAMPLE NUMBER 9200184  
DATA FILE >C4569/>C4585  
CLIENT NAME AIMS  
FIELD ID #2

MATRIX Aqueous  
DILUTION FACTOR 5.00/100.00  
DATE EXTRACTED  
DATE ANALYZED 01/13/92  
ANALYZED BY PAUL

Cas #	Compound	UG/L	MDL	Cas #	Compound	UG/L	MDL
107028	Acrolein	U	250	78875	1,2-Dichloropropane	U	25
107131	Acrylonitrile	U	25	10061015	cis-1,3-Dichloropropene	U	25
74873	Chloromethane	U	50	79016	Trichloroethene	U	25
74839	Bromomethane	U	50	71432	Benzene	U	25
75014	Vinyl Chloride	U	50	124481	Dibromochloromethane	U	25
75003	Chloroethane	U	50	79016	1,1,2-Trichloroethane	U	25
75092	Methylene Chloride	9(J)	25	10061026	trans-1,3-Dichloropropene	U	25
67641	Acetone	133	50	110758	2-Chloroethylvinylether	U	50
75150	Carbon Disulfide	U	25	75252	Bromoform	U	25
75694	Trichlorofluoromethane	U	50	591786	2-Hexanone	U	50
75354	1,1-Dichloroethene	U	25	108101	4-Methyl-2-pentanone	U	50
75353	1,1-Dichloroethane	U	25	127184	Tetrachloroethene	U	25
87005	trans-1,2-Dichloroethene	U	25	79345	1,1,2,2-Tetrachloroethane	U	25
107062	Chloroform	U	25	108883	Toluene	214	25
78933	1,2-Dichloroethane	U	25	108907	Chlorobenzene	U	25
71556	2-Butanone	69	50	100414	Ethylbenzene	4458	25
56235	1,1,1-Trichloroethane	U	25	100425	Styrene	U	25
108054	Carbon Tetrachloride	U	25	1330207	m,p-Xylene	14852	25
75274	Vinyl Acetate	U	50	95476	o-Xylene	4983	25
	Bromodichloromethane	U	25	156592	cis-1,2-Dichloroethene	U	25

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
1,2-Dichloroethane-d4	100.0 %	76 - 114	OK
Toluene-d8	103.9 %	88 - 110	OK
Bromofluorobenzene	101.5 %	86 - 115	OK

(J) Indicates detected below MDL  
(U) Indicates compound analysed for but not detected  
(B) Indicates analyte found in both the blank and sample  
(D) Indicates a secondary dilution



ACCREDITED LABORATORIES, INC  
VOLATILE ORGANIC ANALYSIS DATA

ASE NUMBER 9061  
 SAMPLE NUMBER 9200185  
 DATA FILE >C4570/>C4586  
 CLIENT NAME AIMS  
 FIELD ID #3

MATRIX Aqueous  
 DILUTION FACTOR 5.00/100.00  
 DATE EXTRACTED  
 DATE ANALYZED 01/13/92  
 ANALYZED BY PAUL

Cas #	Compound	UG/L	MDL
107028	Acrolein	U	250
107131	Acrylonitrile	U	25
74873	Chloromethane	U	50
74839	Bromomethane	U	50
75014	Vinyl Chloride	U	50
75003	Chloroethane	U	50
75092	Methylene Chloride	9(J)	25
67641	Acetone	448	50
75150	Carbon Disulfide	U	25
75694	Trichlorofluoromethane	U	50
75354	1,1-Dichloroethene	U	25
75357	1,1-Dichloroethane	U	25
75355	trans-1,2-Dichloroethene	U	25
67663	Chloroform	U	25
107062	1,2-Dichloroethane	U	25
78933	2-Butanone	1164	50
71556	1,1,1-Trichloroethane	U	25
76235	Carbon Tetrachloride	U	25
108054	Vinyl Acetate	U	50
75274	Bromodichloromethane	U	25

Cas #	Compound	UG/L	MDL
78875	1,2-Dichloropropane	U	25
10061015	cis-1,3-Dichloropropene	U	25
79016	Trichloroethene	U	25
71432	Benzene	U	25
124481	Dibromochloromethane	U	25
79016	1,1,2-Trichloroethane	U	25
10061026	trans-1,3-Dichloropropene	U	25
110758	2-Chloroethylvinylether	U	50
75252	Bromoform	U	25
591786	2-Hexanone	38(J)	50
108101	4-Methyl-2-pentanone	U	50
127184	Tetrachloroethene	U	25
79345	1,1,2,2-Tetrachloroethane	U	25
108883	Toluene	745	25
108907	Chlorobenzene	U	25
100414	Ethylbenzene	2248	25
100425	Styrene	U	25
1330207	m,p-Xylene	7321	25
95476	o-Xylene	2773	25
156592	cis-1,2-Dichloroethene	U	25

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
1,2-Dichloroethane-d4	102.3 %	76 - 114	OK
Toluene-d8	104.4 %	88 - 110	OK
Bromofluorobenzene	98.5 %	86 - 115	OK

(J) Indicates detected below MDL

(U) Indicates compound analysed for but not detected

(B) Indicates analyte found in both the blank and sample

(D) Indicates a secondary dilution

ACCREDITED LABORATORIES, INC  
BNA ORGANIC ANALYSIS DATA

CASE NUMBER 9061  
 SAMPLE NUMBER 9200183  
 DATA FILE >F2062  
 CLIENT NAME AIMS  
 FIELD ID #1

MATRIX Aqueous  
 DILUTION FACTOR 7.50  
 DATE EXTRACTED 01/13/92  
 DATE ANALYZED 01/14/92  
 ANALYZED BY MARIE

Cas #	Compound	UG/L	MDL	Cas #	Compound	UG/L	MDL
108952	Phenol	U	75	51285	2,4-Dinitrophenol	U	375
95578	2-Chlorophenol	U	75	100027	4-Nitrophenol	U	375
95487	2-Methylphenol	U	75	534521	4,6-Dinitro-2-methylphenol	U	375
108394	3-Methylphenol	U	75	87865	Pentachlorophenol	U	375
106445	4-Methylphenol	U	75	121142	2,4-Dinitrotoluene	U	75
88755	2-Nitrophenol	U	75	84662	Diethylphthalate	U	75
105679	2,4-Dimethylphenol	U	75	7005723	4-Chlorophenyl-phenylether	U	75
120832	2,4-Dichlorophenol	U	75	86737	Fluorene	U	75
111444	bis(-2-Chloroethyl)Ether	U	75	100016	4-Nitroaniline	U	375
541731	1,3-Dichlorobenzene	U	75	58902	2,3,4,6-Tetrachlorophenol	U	75
106467	1,4-Dichlorobenzene	U	75	86306	N-Nitrosodiphenylamine	U	75
100516	Benzyl Alcohol	U	75	101553	4-Bromophenyl-phenylether	U	75
95501	1,2-Dichlorobenzene	U	75	118741	Hexachlorobenzene	U	75
108601	bis(2-Chloroisopropyl)ether	U	75	85018	Phenanthrene	U	75
621647	N-Nitroso-Di-n-propylamine	U	75	120127	Anthracene	U	75
67721	Hexachloroethane	U	75	84742	Di-n-Butylphthalate	U	75
9553	Nitrobenzene	U	75	206440	Fluoranthene	U	75
91	Isophorone	U	75	129000	Pyrene	U	75
65850	Benzoic Acid	U	375	85687	Butylbenzylphthalate	U	75
111911	bis(-2-Chloroethoxy)Methane	U	75	91941	3,3'-Dichlorobenzidine	U	150
120821	1,2,4-Trichlorobenzene	U	75	56553	Benzo(a)Anthracene	U	75
91203	Naphthalene	U	75	117817	Bis(2-Ethylhexyl)Phthalate	77	75
106478	4-Chloroaniline	U	75	218019	Chrysene	U	75
87683	Hexachlorobutadiene	U	75	117840	Di-n-octyl phthalate	U	75
91576	2-Methylnaphthalene	U	75	205992	Benzo(b)fluoranthene	U	75
77474	Hexachlorocyclopentadiene	U	75	207089	Benzo(k)Fluoranthene	U	75
91587	2-Chloronaphthalene	U	75	50328	Benzo(a)Pyrene	U	75
88744	2-Nitroaniline	U	375	193395	Indeno(1,2,3-cd)Pyrene	U	75
131113	Dimethyl Phthalate	U	75	53703	Dibenzo(a,h)Anthracene	U	75
208968	Acenaphthylene	U	75	191242	Benzo(g,h,i)Perylene	U	75
99092	3-Nitroaniline	U	375	62759	N-Nitrosodimethylamine	U	75
83329	Acenaphthene	U	75	92875	Benzidine	U	75
132649	Dibenzofuran	U	75	122667	1,2-Diphenylhydrazine	U	75
606202	2,6-Dinitrotoluene	U	75	110861	Pyridine	U	75
59507	4-Chloro-3-methylphenol	U	75	79469	2-Nitropropane	U	75
88062	2,4,6-Trichlorophenol	U	75	62533	Aniline	U	75
95954	2,4,5-Trichlorophenol	U	375				

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
2-Fluorophenol	24.2 %	21 - 100	OK
Phenol-d5	90.4 %	10 - 94	OK
Nitrobenzene-d5	131.7 %	35 - 114	OUT
2-Fluorobiphenyl	94.8 %	43 - 116	OK
2,4,6-Tribromophenol	37.6 %	10 - 123	OK
Terphenyl-d14	71.8 %	33 - 141	OK

(J) Indicates detected below MDL

(B) Indicates analyte found in both the blank and sample

(U) Indicates compound analyzed for but not detected

(D) Indicates a secondary dilution

\*\* 3-Methylphenol and 4-methylphenol can not be separated by the method applied.

ACCREDITED LABORATORIES, INC  
BNA ORGANIC ANALYSIS DATA

CASE NUMBER 9061  
SAMPLE NUMBER 9200184  
DATA FILE >F2063 & F2066  
CLIENT NAME AIMS  
FIELD ID #2

MATRIX Aqueous  
DILUTION FACTOR 1.00 & 10.0  
DATE EXTRACTED 01/13/92  
DATE ANALYZED 01/14/92  
ANALYZED BY MARIE

Cas #	Compound	UG/L	MDL	Cas #	Compound	UG/L	MDL
108952	Phenol	U	20	51285	2,4-Dinitrophenol	U	100
95578	2-Chlorophenol	U	20	100027	4-Nitrophenol	U	100
95487	2-Methylphenol	U	20	534521	4,6-Dinitro-2-methylphenol	U	100
108394	3-Methylphenol	U	20	87865	Pentachlorophenol	U	100
106445	4-Methylphenol	U	20	121142	2,4-Dinitrotoluene	U	10
88755	2-Nitrophenol	U	20	84662	Diethylphthalate	U	10
105679	2,4-Dimethylphenol	U	20	7005723	4-Chlorophenyl-phenylether	U	10
120832	2,4-Dichlorophenol	U	20	86737	Fluorene	U	10
111444	bis(-2-Chloroethyl)Ether	U	10	100016	4-Nitroaniline	U	50
541731	1,3-Dichlorobenzene	U	10	58902	2,3,4,6-Tetrachlorophenol	U	10
106467	1,4-Dichlorobenzene	U	10	86306	N-Nitrosodiphenylamine	U	10
100516	Benzyl Alcohol	U	10	101553	4-Bromophenyl-phenylether	U	10
95501	1,2-Dichlorobenzene	U	10	118741	Hexachlorobenzene	U	10
108601	bis(2-Chloroisopropyl)ether	U	10	85018	Phenanthrene	U	10
621647	N-Nitroso-Di-n-propylamine	U	10	120127	Anthracene	U	10
67721	Hexachloroethane	U	10	84742	Di-n-Butylphthalate	U	10
98953	Nitrobenzene	U	10	206440	Fluoranthene	50	10
991	Isophorone	U	10	129000	Pyrene	U	10
950	Benzoic Acid	U	100	85687	Butylbenzylphthalate	U	10
111911	bis(-2-Chloroethoxy)Methane	U	10	91941	3,3'-Dichlorobenzidine	U	20
120821	1,2,4-Trichlorobenzene	U	10	56553	Benzo(a)Anthracene	3(J)	10
91203	Naphthalene	53	10	117817	Bis(2-Ethylhexyl)Phthalate	37	10
106478	4-Chloroaniline	U	10	218019	Chrysene	U	10
87683	Hexachlorobutadiene	U	10	117840	Di-n-octyl phthalate	U	10
91576	2-Methylnaphthalene	U	10	205992	Benzo(b)fluoranthene	8(J)	10
77474	Hexachlorocyclopentadiene	U	10	207089	Benzo(k)Fluoranthene	U	10
91587	2-Chloronaphthalene	U	10	50328	Benzo(a)Pyrene	U	10
88744	2-Nitroaniline	U	50	193395	Indeno(1,2,3-cd)Pyrene	U	10
131113	Dimethyl Phthalate	U	10	53703	Dibenzo(a,h)Anthracene	U	10
208968	Acenaphthylene	U	10	191242	Benzo(g,h,i)Perylene	U	10
99092	3-Nitroaniline	U	50	62759	N-Nitrosodimethylamine	U	10
83329	Acenaphthene	U	10	92875	Benzidine	U	10
132649	Dibenzofuran	U	10	122667	1,2-Diphenylhydrazine	U	10
606202	2,6-Dinitrotoluene	U	10	110861	Pyridine	U	10
59507	4-Chloro-3-methylphenol	U	20	79469	2-Nitropropane	U	10
88062	2,4,6-Trichlorophenol	U	20	62533	Aniline	U	10
95954	2,4,5-Trichlorophenol	U	100				

<u>SURROGATE COMPOUNDS</u>	<u>RECOVERY</u>	<u>LIMITS</u>	<u>STATUS</u>
2-Fluorophenol	28.0 %	21 - 100	OK
Phenol-d5	77.8 %	10 - 94	OK
Nitrobenzene-d5	25.0 %	35 - 114	OUT
2-Fluorobiphenyl	49.6 %	43 - 116	OK
2,4,6-Tribromophenol	47.2 %	10 - 123	OK
Terphenyl-d14	30.4 %	33 - 141	OUT

( ) Indicates detected below MDL

( ) Indicates analyte found in both the blank and sample

(U) Indicates compound analyzed for but not detected

(D) Indicates a secondary dilution

\*\* 3-Methylphenol and 4-methylphenol can not be separated by the method applied.

ACCREDITED LABORATORIES, INC  
BNA ORGANIC ANALYSIS DATA

CASE NUMBER 9061  
 SAMPLE NUMBER 9200185  
 DATA FILE >F2064 & >B7929  
 CLIENT NAME AIMS  
 FIELD ID #3

MATRIX Aqueous  
 DILUTION FACTOR 1.00 & 500.0  
 DATE EXTRACTED 01/13/92  
 DATE ANALYZED 01/14/92 & 01/15/92  
 ANALYZED BY MARIE

Cas #	Compound	UG/L	MDL
108952	Phenol	5703	10
95578	2-Chlorophenol	U	10
95487	2-Methylphenol	U	10
108394	3-Methylphenol	U	10
106445	4-Methylphenol	U	10
88755	2-Nitrophenol	U	10
105679	2,4-Dimethylphenol	U	10
120832	2,4-Dichlorophenol	U	10
111444	bis(-2-Chloroethyl)Ether	U	10
541731	1,3-Dichlorobenzene	U	10
106467	1,4-Dichlorobenzene	U	10
100516	Benzyl Alcohol	U	10
95501	1,2-Dichlorobenzene	U	10
108601	bis(2-Chloroisopropyl)ether	U	10
621647	N-Nitroso-Di-n-propylamine	U	10
67721	Hexachloroethane	U	10
98953	Nitrobenzene	U	10
78591	Isophorone	U	10
65850	Benzoic Acid	U	50
11	bis(-2-Chloroethoxy)Methane	U	10
621	1,2,4-Trichlorobenzene	U	10
91203	Naphthalene	200	10
106478	4-Chloroaniline	U	10
87683	Hexachlorobutadiene	U	10
91576	2-Methylnaphthalene	255	10
77474	Hexachlorocyclopentadiene	U	10
91587	2-Chloronaphthalene	U	10
88744	2-Nitroaniline	U	50
131113	Dimethyl Phthalate	U	10
208968	Acenaphthylene	U	10
99092	3-Nitroaniline	U	50
83329	Acenaphthene	U	10
132649	Dibenzofuran	U	10
606202	2,6-Dinitrotoluene	U	10
59507	4-Chloro-3-methylphenol	U	10
88062	2,4,6-Trichlorophenol	U	10
95954	2,4,5-Trichlorophenol	U	50

Cas #	Compound	UG/L	MDL
51285	2,4-Dinitrophenol	U	50
100027	4-Nitrophenol	U	50
534521	4,6-Dinitro-2-methylphenol	U	50
87865	Pentachlorophenol	U	50
121142	2,4-Dinitrotoluene	U	10
84662	Diethylphthalate	U	10
7005723	4-Chlorophenyl-phenylether	U	10
86737	Fluorene	U	10
100016	4-Nitroaniline	U	50
58902	2,3,4,6-Tetrachlorophenol	U	10
86306	N-Nitrosodiphenylamine	U	10
101553	4-Bromophenyl-phenylether	U	10
118741	Hexachlorobenzene	U	10
85018	Phenanthrene	32	10
120127	Anthracene	U	10
84742	Di-n-Butylphthalate	U	10
206440	Fluoranthene	U	10
129000	Pyrene	U	10
85687	Butylbenzylphthalate	U	10
91941	3,3'-Dichlorobenzidine	U	20
56553	Benzo(a)Anthracene	U	10
117817	Bis(2-Ethylhexyl)Phthalate	154	10
218019	Chrysene	U	10
117840	Di-n-octyl phthalate	U	10
205992	Benzo(b)fluoranthene	U	10
207089	Benzo(k)Fluoranthene	U	10
50328	Benzo(a)Pyrene	U	10
193395	Indeno(1,2,3-cd)Pyrene	U	10
53703	Dibenzo(a,h)Anthracene	U	10
191242	Benzo(g,h,i)Perylene	U	10
62759	N-Nitrosodimethylamine	U	10
92875	Benzidine	U	10
122667	1,2-Diphenylhydrazine	U	10
110861	Pyridine	U	10
79469	2-Nitropropane	U	10
62533	Aniline	U	10

SURROGATE COMPOUNDS	RECOVERY	LIMITS	STATUS
2-Fluorophenol	7.8 %	21 - 100	OUT
Phenol-d5	16.3 %	10 - 94	OK
Nitrobenzene-d5	33.4 %	35 - 114	OUT
2-Fluorobiphenyl	25.9 %	43 - 116	OUT
2,4,6-Tribromophenol	20.3 %	10 - 123	OK
Terphenyl-d14	68.6 %	33 - 141	OK

(J) Indicates detected below MDL

(B) Indicates analyte found in both the blank and sample

(U) Indicates compound analyzed for but not detected

(D) Indicates a secondary dilution

3-Methylphenol and 4-methylphenol can not be separated by the method applied.

ACCREDITED LABORATORIES, INC  
PESTICIDE ANALYSIS DATA

CASE NUMBER 9061  
SAMPLE NUMBER 9200183 P/P AQ  
DATA FILE >A3144  
CLIENT NAME AIMS  
FIELD ID #1

MATRIX Aqueous  
DILUTION FACTOR 1.00  
DATE EXTRACTED 01/13/92  
DATE ANALYZED 01/14/92  
ANALYZED BY CARLOS

COMPOUND	UG/L	MDL
A-BHC	U	.05
B-BHC	U	.05
Lindane	U	.05
D-BHC	U	.05
Heptachlor	U	.05
Aldrin	U	.05
Heptachlor Epoxide	U	.05
Endosulfan I	U	.05
Dieldrin	U	.10
DDE	U	.10
Endrin	U	.10
Endosulfan II	U	.10
DDD	U	.10
Endrin Aldehyde	.14	.10
Endosulfan Sulfate	U	.10
4,4'-DDT	U	.10
Endrin Ketone	U	.10
Methoxychlor	U	.50
A-Chlordane	U	.50
G-Chlordane	U	.50
Toxaphene	U	1.00

(J) Indicates detected below MDL

(U) Indicates compound analyzed for but not detected

ACCREDITED LABORATORIES, INC  
PCB ORGANIC ANALYSIS DATA

CASE NUMBER	9061
SAMPLE NUMBER	9200183 P/P AQ
DATA FILE	>G0567
CLIENT NAME	AIMS
FIELD ID	#1

MATRIX	Aqueous
DILUTION FACTOR	1.00
DATE EXTRACTED	01/13/92
DATE ANALYZED	01/14/92
ANALYZED BY	CARLOS

CAS#	COMPOUND	UG/L	MDL
12674112	Aroclor-1016	U	1.0
11104282	Aroclor-1221	U	1.0
11141165	Aroclor-1232	U	2.0
53469219	Aroclor-1242	U	1.0
12672296	Aroclor-1248	U	1.0
11097691	Aroclor-1254	U	1.0
11096825	Aroclor-1260	U	1.0

(J) Indicates detected below MDL  
(U) Indicates compound analyzed for but not detected  
(B) Indicates analyte found in both the blank and sample  
(D) Indicates a secondary dilution

ACCREDITED LABORATORIES, INC  
PESTICIDE ANALYSIS DATA

CASE NUMBER 9061  
SAMPLE NUMBER 9200184 P/P AQ  
DATA FILE >A3145  
CLIENT NAME AIMS  
FIELD ID #2

MATRIX Aqueous  
DILUTION FACTOR 1.00  
DATE EXTRACTED 01/13/92  
DATE ANALYZED 01/14/92  
ANALYZED BY CARLOS

COMPOUND	UG/L	MDL
A-BHC	U	.05
B-BHC	U	.05
Lindane	U	.05
D-BHC	U	.05
Heptachlor	U	.05
Aldrin	U	.05
Heptachlor Epoxide	U	.05
Endosulfan I	U	.05
Dieldrin	U	.10
DDE	U	.10
Endrin	U	.10
Endosulfan II	U	.10
DDD	U	.10
Endrin Aldehyde	U	.10
Endosulfan Sulfate	U	.10
4,4'-DDT	U	.10
Endrin Ketone	U	.10
Methoxychlor	U	.50
A-Chlordane	U	.50
G-Chlordane	U	.50
Toxaphene	U	1.00

(J) Indicates detected below MDL

(U) Indicates compound analyzed for but not detected

ACCREDITED LABORATORIES, INC  
PCB ORGANIC ANALYSIS DATA

CASE NUMBER	9061
SAMPLE NUMBER	9200184 P/P AQ
DATA FILE	>G0568
CLIENT NAME	AIMS
FIELD ID	#2

MATRIX	Aqueous
DILUTION FACTOR	1.00
DATE EXTRACTED	01/13/92
DATE ANALYZED	01/14/92
ANALYZED BY	CARLOS

CAS#	COMPOUND	UG/L	MDL
12674112	Aroclor-1016	U	1.0
11104282	Aroclor-1221	U	1.0
11141165	Aroclor-1232	U	2.0
53469219	Aroclor-1242	U	1.0
12672296	Aroclor-1248	U	1.0
11097691	Aroclor-1254	U	1.0
11096825	Aroclor-1260	U	1.0

(J) Indicates detected below MDL  
(U) Indicates compound analyzed for but not detected  
(B) Indicates analyte found in both the blank and sample  
(D) Indicates a secondary dilution



ACCREDITED LABORATORIES, INC  
PCB ORGANIC ANALYSIS DATA

CASE NUMBER	9061	MATRIX	Aqueous
SAMPLE NUMBER	9200185 P/P AQ	DILUTION FACTOR	1.00
DATA FILE	>G0569	DATE EXTRACTED	01/13/92
CLIENT NAME	AIMS	DATE ANALYZED	01/14/92
FIELD ID	#3	ANALYZED BY	CARLOS

CAS#	COMPOUND	UG/L	MDL
12674112	Aroclor-1016	U	1.0
11104282	Aroclor-1221	U	1.0
11141165	Aroclor-1232	U	2.0
53469219	Aroclor-1242	U	1.0
12672296	Aroclor-1248	U	1.0
11097691	Aroclor-1254	U	1.0
11096825	Aroclor-1260	U	1.0

(J) Indicates detected below MDL  
(U) Indicates compound analyzed for but not detected  
(B) Indicates analyte found in both the blank and sample  
(D) Indicates a secondary dilution

ACCREDITED LABORATORIES, INC  
PESTICIDE ANALYSIS DATA

CASE NUMBER	9061	MATRIX	Aqueous
SAMPLE NUMBER	9200185 P/P AQ	DILUTION FACTOR	1.00
DATA FILE	>A3146	DATE EXTRACTED	01/13/92
CLIENT NAME	AIMS	DATE ANALYZED	01/14/92
FIELD ID	#3	ANALYZED BY	CARLOS

COMPOUND	UG/L	MDL
A-BHC	U	.05
B-BHC	U	.05
Lindane	.15	.05
D-BHC	U	.05
Heptachlor	U	.05
Aldrin	U	.05
Heptachlor Epoxide	U	.05
Endosulfan I	U	.05
Dieldrin	U	.10
DDE	U	.10
Endrin	U	.10
Endosulfan II	U	.10
DDD	U	.10
Endrin Aldehyde	U	.10
Endosulfan Sulfate	U	.10
4,4'-DDT	U	.10
Endrin Ketone	U	.10
Methoxychlor	U	.50
A-Chlordane	U	.50
G-Chlordane	U	.50
Toxaphene	U	1.00

(J) Indicates detected below MDL  
(U) Indicates compound analyzed for but not detected

842899861

Accredited Laboratories, Inc.  
Total Cyanide

Client: AIMS  
Case #: 9061  
Analyst: APZ

Matrix: Aqueous  
Date Prepared: 01/13/92  
Date Analyzed: 01/14/92

Field #	Sample #	Result mg/L	MDL mg/L
#1	9200183	ND	0.03
#2	9200184	ND	0.03
#3	9200185	ND	0.03

Quality Control Number: 911219AC  
Method Blank: < 0.01  
Percent Spike Recovery: 94.8  
Control Limit: 0.01

842899862

Accredited Laboratories, Inc.  
pH

Client: AIMS  
Case #: 9061  
Analyst: LS

Matrix: Aqueous  
Date Sampled: 1/11/92  
Date Received: 1/13/92  
Date Analyzed: 1/13/92

Field #	Sample #	Result SU	MDL SU
#1	9200183	4.78	0.05
#2	9200184	6.97	0.05
#3	9200185	8.85	0.05

842899863

fax 756-5797

CHAIN OF CUSTODY

Company Name <b>Reichhold Chemicals</b>						No. of con- tainers	TESTS									
Project Name <b>NEWARK, NJ</b>							<div style="transform: rotate(-45deg); display: inline-block;">                     priority pollutants less metals corrosivity                 </div>									
Samplers: <b>Mike Pennington</b>																
	Date	Time	Comp.	Grab	Station Location											Remarks
#1	1/11/92	1:00		X	Loading Dock	3	X	X								24hr Rush VO's 72hr Rush Resto Analysis
#2	1/11/92	1:15		X	water tank	3	X	X								11
#3	1/11/92	1:30	X		TANKERS	3	X	X								11
Standard deliverables																
Relinquished by: (Signature) <i>Michael Pennington</i>			Date/Time <i>1/11/92 9:AM</i>		Received by: (Signature) <i>Adam Bana</i>			Relinquished by: (Signature) <i>Adam Bana</i>			Date/Time <i>1/12/92 11:45</i>		Received by: (Signature) <i>Donna Bana</i>			
Relinquished by: (Signature)			Date/Time		Received by: (Signature)			Relinquished by: (Signature)			Date/Time		Received by: (Signature)			
Relinquished by: (Signature)			Date/Time		Received for Laboratory by: (Signature)			Date/Time		Remarks						

C-9061

UNIFORM

## PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

Bureau of Waste Management

P. O. Box 8550

Harrisburg, PA 17105-8550

## OFFICIAL PENNSYLVANIA MANIFEST FORM

FOR SHIPMENT OF HAZARDOUS, INFECTIOUS  
AND CHEMOTHERAPEUTIC WASTE.

Form approved.

OMB No. 2050-0039

Expires 9-30-92

UNIFORM HAZARDOUS  
WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest  
Document No.2. Page 1  
of 1Information in the shaded areas  
is not required by Federal law  
but is required by State law.

3. Generator's Name and Mailing Address

Reichold Chemical Inc.  
400 Doremus Ave.

A. State Manifest Document Number

PAC-5756623

4. Generator's Phone ( 201 ) 589-3709

Newark, NJ 07105

B. State Gen. ID

SAME

5. Transporter 1 Company Name

S-J Transportation Co.

6. US EPA ID Number

NJ D 07 16 299 76

C. State Trans. ID

PA- AH 100 15

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone ( 609 ) 769-27431

9. Designated Facility Name and Site Address

Waste Conversion Inc.  
2869 Sandstone Drive  
Hatfield, PA 19440

10. US EPA ID Number

PA D 08 56 90 592

E. State Trans. ID

PA-

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone ( 215 ) 822-8996

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

a. RQ, Waste Flammable Liquid NOS  
Flammable Liquid UN1993 (thinner and water)12. Containers  
No. Type

0 0 1 T T

13. Total  
Quantity

0 5 0 0 0

14. Unit  
Wt/Vol

G

15. Waste No.

D 0 0 1

J. Additional Descriptions for Materials Listed Above

Lab Pack

Physical State

Lab Pack

Physical State

a. ☐

L WL26839 (I)

c. ☐

K. Handling Codes for Wastes Listed Above

a. S02

c.

b. ☐d. ☐

b.

d.

15. Special Handling Instructions and Additional Information

Emergency Contact: R NAUTELIS  
Emergency Phone: 201 589 3709  
Emergency Guide No.: 27

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

ROBERT NAUTELIS

Signature

Robert Nautelis

MONTH DAY YEAR

10 13 1992

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

JERRY L DAVIS

Signature

Jerry L Davis

MONTH DAY YEAR

10 13 1992

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

MONTH DAY YEAR

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

PAUL CORNELL

Signature

Paul Cornell

MONTH DAY YEAR

10 13 1992

842899865

Reichhold Chemicals, Inc.

Corporate Headquarters

P.O. Box 13582

Charlotte, North Carolina 27709-3582

Bob - Did you see this?  
→ Kent Bob

Certified Mail - Return Receipt Requested

REICHHOLD

February 27, 1992

Ms. Ellen Banner  
Environmental Scientist  
Response and Prevention Branch  
U.S. Environmental Protection Agency  
2890 Woodbridge Avenue  
Building 209, MS-211  
Edison, New Jersey 08837-3679

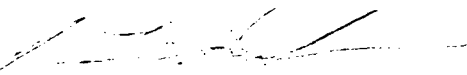
RE: Reichhold Chemicals, Inc. - Newark, New Jersey  
Emergency Response Notification Verification

Dear Ms. Banner:

On January 27, 1992, Reichhold Chemicals, Incorporated received a detailed questionnaire from Mr. Bruce E. Sprague of EPA's Response and Prevention Branch. The questionnaire requested information related to the explosion and fire which occurred on January 10, 1992 at the Reichhold facility located at 400 Doremus Avenue in Newark, New Jersey.

A copy of the completed questionnaire is enclosed. The exact cause of the explosion is still under investigation, and follow-up information will be provided as it becomes available. If you have any questions concerning this submittal, please call me at (919) 990-7601.

Sincerely,



J.L. Graham  
Manager, Environmental Compliance

BSC/gc  
Enclosure

100-1000  
100-1000

842899866

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
ACCIDENTAL RELEASE INFORMATION PROGRAM****PART A. EMERGENCY RESPONSE NOTIFICATION SYSTEM - VERIFICATION**

Information regarding an accidental release incident in your facility has been recorded in the Emergency Response Notification System (ERNS). Below is the information available in ERNS regarding this release. Please verify this information by making any corrections and/or by providing any missing information in the spaces provided (attach additional pages as necessary).

1. Facility: REIGHOLD CHEMICALS, INC.

Dun & Bradstreet Number 09 - 221 - 7892

Street 400 Doremus Avenue

City Newark

County Essex

State New Jersey Zip 07105

Telephone ( 201 ) 589-3709

2. Spill Location: ( X Check here if same as Facility Address)

Street \_\_\_\_\_

City \_\_\_\_\_

County \_\_\_\_\_

State \_\_\_\_\_

Zip \_\_\_\_\_

Telephone (     ) \_\_\_\_\_

Latitude (Deg/Min) \_\_\_\_\_ / \_\_\_\_\_ Longitude \_\_\_\_\_ / \_\_\_\_\_

3. Primary Chemical Released: POLYMERIZED N-BUTYL ACRYLATE

4. ERNS Reporting Date/Time: 1/11/92 / 0142  
(mm/dd/yy) (24-hr clock)

5. Reported through NRC? Yes X No \_\_\_\_\_



# 6. Federal, State, and Local Authorities Notified:

(e.g., NRC, EPA Regional Office, SERC, DNR, LEPC, Police, and others.  
Show dates as mm/dd/yy; times in 24 hour clock.)

<u>Agency</u>	<u>Date</u>	<u>Time</u>	<u>Person Contacted</u>
EPA Region II	1/11/92		
NJDEPE	1/11/92	0130	N.J. Emergency Hotline - Operator 22
Newark Fire Dept.	1/10/92	Appr. 2330	?
Newark Hazmat	1/10/92	Appr. 2330	?
NRC	1/11/92	1:30 a.m.	Mr. Maulein

# 7. Responding Agencies:

EPA-Region II (OSC/TAT)	BATF
NJDEPE	
Newark Fire Department	
Newark Hazmat	
OSHA	
Newark Police	
Coast Guard	

# 8. Response Action(s):

Immediately after the explosion, the primary concern was control of fire water run-off which was accomplished by the use of a Vac Truck. After the fire was put out, emphasis shifted to removal of external ACM, diking of door openings, draining of potentially reactive monomer mix, covering para-formaldehyde to reduce emissions, removal of dry chemical inventory, etc. Currently, we have requested proposals for Phase II of the site clean-up and are awaiting responses. EPA has been supplied copies of bid documents.

Wrong -  
Sist was  
one of  
vict  
injured  
people

PART B. ACCIDENTAL RELEASE PREVENTION - SUPPLEMENTAL INFORMATION

SECTION I. FACILITY PROFILE

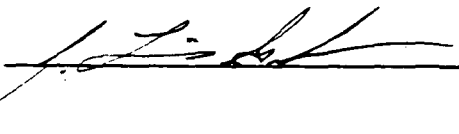
1. Plant Manager/Facility Owner: KENT TAYLOR

2. Responding Official: LOUIS GRAHAM

Title: Manager, Environmental Compliance

Address: P.O. Box 13582  
R.T.P., N.C. 27709-3582

Telephone: ( 919 ) 990-7601

Signature:  Date: 2-26-92

3. Please provide the four-digit Standard Industrial Classification (SIC) codes that best describe your facility operations:

SIC code(s): 2821, \_\_\_\_\_, \_\_\_\_\_  
(Primary)

Primary product or service: ALKYD RESIN MANUFACTURE

4. Indicate the total number of employees typically at the facility (include all full-time and part time employees, all employees on sick leave, paid holidays, paid vacations, managers and corporate officers at the facility, and contractors):

Number of Employees: TOTAL - 65  
Day Shift - 35  
Off Shifts (2) - 13

**SECTION II. HAZARDOUS SUBSTANCE RELEASE PROFILE**

For the following section, if exact responses cannot be provided please provide estimates using your best professional judgment.

5. Date/Time Release Began: 1/10/92 ; 2330  
(month/day/year) (24-hr clock)

Ended: 1/11/92 ; 0130\*  
(month/day/year) (24-hr clock)

\* Fire completely put out by 0430

6. In the table below, provide release estimates for the primary chemical released (in lbs, only) to each media. Quantities released to each media should add up to the total quantity released. For solutions, adjust the quantity of the chemical released for chemical concentration (e.g., report 1,000 lbs of 50% sulfuric acid released as 500 lbs sulfuric acid). For multiple chemicals attach additional pages as necessary. Other items were released within the building, see Attachment #1

Chemical Name: Polymerized N-Butyl Acrylate

CAS Number: 141-32-2

Concentration (wt%): 100%

Physical State at time of release: Viscous Liquid

Released To:	Quantity (lbs):
Air	<u>*</u>
Surface Water	<u>500-1000 lbs. released to asphalt pavement</u>
Land	<u></u>
Treatment Facility	<u></u>

Total Quantity Released:

\* Fire consumed some material - Approx. 250,000 lbs. - release to air is unknown

7. Check the item below that best describes when the release occurred:

- a. ☒ During routine operation
- b. ☐ During routine startup
- c. ☐ While in process of shutting down operations
- d. ☐ While unit was shutdown for maintenance/product changeover, etc.
- e. ☐ During special test, or non-standard, trial run conditions
- f. ☐ During startup of new construction, new equipment
- g. ☐ Other (please describe):

8. Check the item below that best describes the status of the facility, unit, or process line as a result of the release:

- a. ☐ No interruption; continued operations
- b. ☐ Restarted after release
- c. ☐ Shut down for repairs; with plans to restart
- d. ☐ Permanently closed
- e. ☒ Other (please describe):

Manufacturing shut-down - terminal operations are continuing - future plans  
are yet unknown

9. Check the one item below that best describes the location of the loss of containment in the specified area:

- a. Process Vessel: ☐ wall, ☐ overflow, ☒ vent, ☐ drain
- b. Storage vessel: ☐ wall, ☐ overflow, ☐ vent, ☐ drain
- c. Valve: ☐ flange, ☐ seal, ☐ body
- d. Piping: ☐ flange, ☐ joint, ☐ elbow, ☐ wall
- e. Pump: ☐ flange, ☐ seal, ☐ body
- f. Other process equipment (please describe):

Manhole cover and rupture disc blew off the vessel

10. How was the release first discovered? (check as many as apply)

- a. ☐ Process control device indication
- b. ☐ Chemical specific detector, alarm
- c. ☒ Observation by employee(s)
- d. ☒ Explosion/fire
- e. ☐ Third party notification
- f. ☐ Other (please describe):

11. Check one item below that best describes what initiated the release:

- a. ☐ Equipment failure
- b. ☒ Operator error \*

\* Preliminary Indication

12. Indicate other factors that contributed to the equipment failure or operator error (check as many as apply and elaborate below):

- a. ☐ "Upset" condition
- b. ☐ "By-pass" condition
- c. ☐ Maintenance activity
- d. ☐ Training deficiencies
- e. ☐ Inappropriate operating procedures
- f. ☐ Faulty process design
- g. ☐ Unsuitable equipment
- h. ☐ Unusual weather Conditions
- i. ☒ Other (please describe):

This is currently under investigation. We will supplement our answer when our investigation is sufficiently complete to draw reliable conclusions

13. Provide a brief chronological description of the events that led up to and contributed to the release event (if helpful, include a sketch). Briefly discuss the results of your investigation. Use additional pages as necessary.

Initiator (Vaso 64) was added to inhibited butyl acrylate monomer that was contained in a pre-mix tank per normal procedure. At the appropriate time, transfer was attempted to another pre-mix tank containing other monomers; this pre-mix tank also served as the feed tank for the reactor vessel. Transfer was unsuccessful. Several attempts to transfer were made over a period of time, during which the production operators attempted to reach a maintenance person. During this time, the inhibited butyl acrylate monomer apparently polymerized. This polymerization apparently raised the temperature inside the tank sufficiently to cause a rapid violent decomposition of the initiator.

14. Check all items that describe the end effects of the release event:

- a. ☒ Spill
- b. ☒ Vapor release
- c. ☒ Explosion
- d. ☒ Fire
- e. ☐ Other (describe):

15. Was the general public notified? Yes \_\_\_\_\_ No X

If yes, indicate the type of communication technologies used to alert and notify the public to evacuate or take other safety measures. Check as many items as apply:

to H-C. ✓

- a. \_\_\_\_\_ Door-to-door notification
- b. \_\_\_\_\_ Loudspeakers/public access system
- c. \_\_\_\_\_ Tone alert radio/pagers
- d. \_\_\_\_\_ Siren/alarms
- e. \_\_\_\_\_ Modulated power lines
- f. \_\_\_\_\_ Aircraft
- g. \_\_\_\_\_ Radio
- h. \_\_\_\_\_ Television
- i. \_\_\_\_\_ Cable override
- j. \_\_\_\_\_ Telephone
- k. \_\_\_\_\_ Other (please describe):

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16. Indicate the number of persons injured, hospitalized (as opposed to treated and released) and fatalities that occurred as a result of the release (indicate with NA if not known):

	<u>Injuries</u>	<u>Hospitalized</u>	<u>Fatalities</u>
Facility employees	<u>8</u>	<u>4</u>	<u>0</u>
Contractors	<u>0</u>	<u>0</u>	<u>0</u>
General public	<u>0</u>	<u>0</u>	<u>0</u>
Responders	<u>na</u>	<u>na</u>	<u>0</u>

17. Indicate the number of persons evacuated and/or sheltered-in-place as a result of the release (indicate with NA if not known):

	<u>Evacuated</u>	<u>Sheltered in Place</u>
Facility employees	<u>10-15*</u>	<u>0</u>
Contractors	<u>0</u>	<u>0</u>
General public	<u>0</u>	<u>0</u>

\* All employees that were on-site were evacuated to a safe place

18. Describe the immediate response activities taken to mitigate the release (capture, neutralize or destroy a toxic chemical before it is released into the environment). Check as many as apply.

- a. ☐ Reduce system pressure/temperature
- b. ☐ Apply spray scrubber/curtain
- c. ☐ Transfer contents from failed equipment
- d. ☐ Dilute and/or neutralize
- e. ☐ Containment
- f. ☒ Plant/process shutdown
- g. ☐ Divert release to treatment
- h. ☐ Vacuum/release recovery
- i. ☐ Incineration/flares ?
- j. ☒ None
- k. ☐ Other (describe):

Initial release was instantaneous. Subsequent emission were due to the fire.

The fire was aggressively attacked by NFD. Run-off from firefighting operations was collected by a vacuum truck for disposal.

19. Indicate the environmental effects that occurred as a result of the release:

- a. ☐ Fish Kills
- b. ☐ Vegetation damage
- c. ☐ Soil contamination
- d. ☐ Groundwater contamination
- e. ☐ Wildlife kills
- f. ☐ None
- g. ☒ Other (please describe):

Resinous material was sprayed onto asphalt pavement. The remainder was contained within the building. Some fire water was released to Newark Bay - amount is unknown. No known damage occurred from this release.

20. Estimate the financial impact of the accidental release for the facility (e.g., cleanup cost, outside contractors cost, hours/wages diverted to cleanup or lost to shutdown, loss of production) and for the general public (e.g., damage to natural resources, public and private properties). An aggregate figure may be provided if a breakdown is not available.

a. Facility Costs: \$ Unknown, at least several million dollars

b. General Public Costs: \$ -0-

Total Costs: \$ Unknown, at least several million dollars

SECTION III. PREVENTION PROFILE

- 21a. What formalized hazard evaluation was performed prior to this release at the process or storage area within your facility where the accident occurred? When was it last conducted? How frequently is this evaluation conducted (e.g. every 2 years)? Indicate frequency in years and date last conducted as mm/dd/yy.

	<u>Frequency</u>	<u>Last Conducted</u>
a. <input type="checkbox"/> Cause-Consequence analyses	_____	_____
b. <input type="checkbox"/> Dow and Mond Hazard Indices	_____	_____
c. <input type="checkbox"/> Event Tree analyses	_____	_____
d. <input type="checkbox"/> Failure Modes/Effects analyses	_____	_____
e. <input type="checkbox"/> Fault Tree analyses	_____	_____
f. <input type="checkbox"/> HAZOP Studies	_____	_____
g. <input type="checkbox"/> Human Error analyses	_____	_____
h. <input type="checkbox"/> Probabilistic Risk Assessments	_____	_____
i. <input type="checkbox"/> What If analyses	_____	_____
j. <input type="checkbox"/> No evaluation ever done for this area	_____	_____
k. <input checked="" type="checkbox"/> Other evaluation (describe, indicate frequency, date done):		

There is an annual inspection of the process and other areas conducted by our insurance company (IRI). In addition, a due-diligence inspection was performed in 1989 when Reichhold obtained the site from NL Chemicals.

- 21b. Was the hazard evaluation performed effective in predicting this release event? Why or why not?

As the exact cause of the accident has not been determined, it is difficult to say.  
A preliminary hypothesis is operator error.

- 22a. Identify the training, procedures, and/or management practices used at this facility prior to this release to prevent accidental releases. Check all that apply.

a. ☒ Preventive Maintenance/Inspections  
 b. ☒ Accident Investigations  
 c. ☐ Audits  
 d. ☐ Inventory/capacity reductions  
 e. ☒ Employee safety training  
 f. ☒ Standard operating procedures  
 g. ☒ Emergency response training  
 h. ☐ None  
 i. ☐ Other (please describe):



- 22b. Describe any changes to existing training, procedures and management practices, or what new types of training, procedures and management practices are or will be implemented as a result of this release?

Future status of this facility is not yet known. If restarting the facility is determined to be the option, a process safety review will be conducted prior to beginning operations.

- 23a. What engineering systems or controls were in use prior to the release at the process or storage area within your facility where the accident occurred? Check all that apply.

- a. ☐ Backup/Redundant systems
- b. ☐ Automatic Shut-offs
- c. ☐ Bypass/Surge systems
- d. ☐ Manual Overrides
- e. ☐ Controls for operations monitoring and warning
- f. ☐ Interlocks
- g. ☐ None
- h. ☒ Other (please describe):

The system which was installed by the previous owner was engineered with a vent and rupture disk to prevent over pressurization and explosion.

- 23b. Describe any changes to the existing engineering systems or controls, and any new types of engineering systems/controls that are or will be implemented as a result of this release:

Evaluate - Upsized pressure relief systems, with rupture disk - blow disk  
 - Kill solution systems  
 - Additional operation procedures  
 - Temperature Alarms  
 - Confined  
 - Cutoff tank with high level  
 - pressure relief tank to 50 or 100 psig

## ATTACHMENT # 1

The following is a list of chemicals that were stored on the fifth floor of building 31/32, that may have been released during the fire. Most of this material was powder form and was stored in bags, fiber drums, or "supersacks." Some of the containers burned in the fire and the powdered materials have spilled onto the floor and have been washed onto the other floors by the sprinkler system. Any liquid material in 55 gallon metal drums remains intact and was not released.

<u>Common Name</u>	<u>C.A.S. Number</u>
N-Butyl Acrylate	141-31-2
Azobisobutyronitrile	78-67-1
Hydrocarbon Resin	68131-87-3
Hexamethylenetetramine	100-97-0
Melamine	108-78-1
Hydrogenated Diphenylolpropane	unknown
Methacrylic Acid	79-41-4
Trimethylolethane	77-85-0
Fatty Acids C16-C19	67701-03-5
Phenolic Resin	54579-447-1
Betaprene BC115D Hydrocarbon Resin	unknown
Urea	57-13-6
Pentaerythritol	115-77-5
Phthalic Anhydride	85-44-9
Maleic Anhydride	108-31-6
Trimellitic Anhydride	552-30-7
Paraformaldehyde	30525-89-4
P-Tert Butyl Benzoic Acid	98-73-7
Benzoic Acid	65-85-0
Ortho-Para Toluene Sulfonamide	8013-74-9
Chlorendic Anhydride	115-27-5
N-Pelargonic Acid	112-05-0
Benzoquanamine	unknown
Polyethylene Glycol	25322-68-3
Adipic Acid	124-04-9
Bisphenol A	80-05-7
Trimethylolpropane	77-99-6
Neopentyl Glycol	126-30-7
Polyester Resin Solution	mixture
Alkyd Resin Solution	mixture
Maleinized Oil Resin Solution	mixture
Diatomaceous Earth	68855-54-9

**Reichhold Chemicals, Inc.**  
Corporate Headquarters  
P.O. Box 13582  
Research Triangle Park, NC 27709-3582

**REICHHOLD**

February 7, 1992

N.J.D.E.P.E.  
Bureau of Discharge Prevention  
401 East State Street  
CN 027  
Trenton, New Jersey 08625 - 0027

RE: N.J.D.E.P.E. Spill Case # 92-1-11-0147-00  
National Response Center Case # 102412

Gentlemen:

Attached hereto is the confirmation report to meet the requirements in N.J.A.C. 7:1E-5.8(b), for the release reported under the above listed case numbers. Also enclosed is an affidavit, in accordance with N.J.A.C. 7:1E-5.6(b), that the notification made was as immediate as possible under the circumstances in which the discharge occurred.

Should you require further information, please feel free to contact me at (201)589-3709.

Very truly yours,



Kent Taylor  
Plant Manager

KT/jr

Attachments

# REICHOLD CHEMICALS, INC.

Newark, New Jersey

## Justification for Delay of Notification of Discharge N.J.A.C. 7:1E-5.6(b)

1. **Facility Address:**

Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, N.J. 07105

2. **Date and time discharge began and ended:**

The release resulted from an explosion and fire which occurred at approximately 11:30 p.m. on January 10, 1992. The fire was brought under control at about 1:30 a.m., January 11, 1992; cardboard packaging material continued to smoulder until about 4:30 a.m. that morning.

3. **Person discovering discharge:**

The supervisor on duty was -

Mr. E. Zglobicki, Shift Supervisor  
Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey 07105  
(201) 589-3709

4. **Date, time, circumstance when release discovered:**

See item 2 above

5. **Reasons for discharge not immediately discovered:**

Not applicable

6. **Date and time discharge first reported:**

The release was reported to the N.J.D.E.P.E. at approximately 1:30 a.m., January 11, 1992.

842899879

7. **Person who notified the Department:**

David W. Bright  
Reichhold Chemicals, Inc.  
2400 Ellis Road  
Durham, N.C. 27703-5543  
(919) 990-7570

8. **Reason for notification delay:**

Notification of the N.J.D.E.P.E. within 15 minutes of the explosion/fire was impossible or unreasonable because all employees at the site were either; (1) too severely injured, (2) searching for or responding to severely injured employees, or (3) involved with emergency response activities.

9. **Demonstration notification was made as soon as reasonable:**

The N.J.D.E.P.E. was called as soon as the emergency activities listed in Number 8 above were completed, within 90 minutes of the beginning of the accident.

**CERTIFICATION:**

I certify, under penalty of law, that the information provided in this document is true, accurate and complete to the best of my knowledge and belief. I am aware that there are significant civil and criminal penalties, including fines or imprisonment or both, for submitting false, inaccurate or incomplete information.



---

Kent Taylor  
Plant Manager

**REICHOLD CHEMICALS, INC.**

Newark, New Jersey

Confirmation Report

N.J.A.C. 7:1E-5.8

**Case Numbers:**

N.J.D.E.P.E. # 92-1-11-0147-00  
National Response Center # 10242121

**1. Person Reporting Discharge**

David W. Bright  
Reichhold Chemicals, Inc.  
2400 Ellis Road  
Durham, N. C. 27703-5543  
(919) 9990-7570

**2. Person submitting this report:**

Mr. Kent Taylor  
Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey 07105  
(201) 589-3709

**3. Information for party responsible for reporting, if report made by third party:**

Not Applicable

**4. Person responsible for discharge:**

Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey 07105

**5. Facility owner and operator:**

Same as 4 above.

842899881

6. Source of discharge:

A fire/explosion occurred in buildings 31/32 which are separated by a fire wall. The fire is believed to have started on the fifth floor of building 31. Investigations into the exact cause are on-going, but it is known that the manhole cover of a monomer addition tank containing approximately 4,000 pounds of n-butyl acrylate monomer was blown off, and that fire was intense in this area.

Investigations to date have not revealed other possible sources for the explosion.

7. Location of discharge:

Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey 07105  
(201) 589-3709

7.i. Location if discharge continued:

Tax Lot Number: 5070  
Tax Block Number: 011  
County: Essex  
Facility E.P.A I.D. #: NJDO92217892

7.ii. Body of Water

Confluence of the Passaic River and Newark Bay  
Latitude 40 deg. 43 min. 12 sec.  
Longitude 74 deg. 7 min. 30 sec.

8. Hazardous substance discharged:

The following is a list of chemicals that were stored on the fifth floor of buildings 31/32, that may have been released during the fire. Most of this material was in powder form and was stored in bags, fiber drums, or "supersacks". Some of the containers burned in the fire and the powdered materials have spilled onto the floor and have been washed onto the other floors by the sprinkler system.

<u>COMMON NAME</u>	<u>C.A.S. NUMBER</u>
N-Butyl Acrylate	141-31-2
Azoisobutyronitrile	78-67-1
Hydrocarbon Resin	68131-87-3
Hexamethylenetetramine	100-97-0
Melamine	108-78-1
Hydrogenated Diphenylolpropane	unknown
Methacrylic Acid	79-41-4
Trimethylolethane	77-85-0
Fatty Acids C16-C19	67701-03-5
Phenolic Resin	54579-447-1
Betaprene BC115D Hydrocarbon Resin	unknown
Urea	57-13-6
Pentaerythritol	115-77-5
Phthalic Anhydride	85-44-9
Maleic Anhydride	108-31-6
Trimellitic Anhydride	552-30-7
Paraformaldehyde	30525-89-4
P-Tert Butyl Benzoic Acid	98-73-7
Benzoic Acid	65-85-0
Ortho-Para Toluene Sulfonamide	8013-74-9
Chlorendic Anhydride	115-27-5
N-Pelargonic Acid	112-05-0
Benzoquanamine	unknown
Polyethylene Glycol	25322-68-3
Adipic Acid	124-04-9
Bisphenol A	80-05-7
Trimethylolpropane	77-99-6
Neopentyl Glycol	126-30-7
Polyester Resin Solution	mixture
Alkyd Resin Solution	mixture
Maleinized Oil Resin Solution	mixture
Diatomaceous Earth	68855-54-9

9. **Quantities of hazardous substances discharged:**

Accurate quantities of a hazardous substances released cannot be determined, because of restrictions on access to the affected area. As mentioned above, bagged material was damaged by fire and the sprinkler system. Some of it was washed onto the floor, and mixed together. There may have been up to 600,000 pounds of raw materials in bags and fiber drums. For preliminary purposes, it can be estimated that approximately 10 percent of the material stored in bags and fiber drums was released within the building. Several drums of resin stored near Tank 125 and most of the contents of Tank 125 were released onto the fifth floor. Tank 125 contained a n-butyl acrylate monomer. An estimated 50-100 gallons of this resin sprayed out of the building onto the driveway below.



There is considerable structural damage on the fifth floor which must be corrected before a full assessment can be made. Shoring of the roof is in progress and should be completed by March 1, 1992. A supplemental report will be issued when information becomes available.

\* Water used to extinguish the fire washed out of the building and into the asphalt parking lot. About 15,000 gallons of this water was collected in 3 tanker trucks. This water was analyzed and found to be free of contaminants that would require it to be disposed of as a hazardous waste. Analysis of this water was performed by Accredited Laboratories of Carteret, N.J. for priority pollutants and T.C.L.P. Copies of the analytical reports are attached hereto. The water was disposed of at Waste Conversion, Inc. in Hatfield, Pennsylvania. Waste Conversion is an authorized treatment facility for hazardous and non-hazardous aqueous waste streams.

An unknown volume of water washed through storm drains into the Passaic River at the east end of the property. This was brought to the attention of D.E.P.E. and E.P.A. responders by plant personnel. Upon observation, no sheen was present and it was concluded that no action was required.

A fourth tanker truck was filled with water from the first floor of building 31, from elevator shafts and from a tank used to collect raw process water. Removal of water from Tank-66 on the first floor allowed some water from upper floors to drain into the tank for containment. This water was initially thought to be non-hazardous, but upon receipt at Waste Conversion was found to have a flash point of 55 degrees Fahrenheit. It was reshipped directed to Delaware Container, Inc. for disposal as a hazardous waste. A copy of the manifest is attached.

#### 10. Reporting Chronology:

The fire/explosion occurred at about 11:30 p.m. Friday, January 10, 1992. It was brought under control by 1:30 a.m. on January 11th. Cardboard packaging material continued to smoulder for several more hours, but was extinguished by 4:30 a.m. Initial notification was made to the D.E.P.E. and the National Response Center at approximately 1:00 a.m.

11. **Containment/Clean-up measures:**

Emergency response contractors were on-site at sunrise on January 11th to contain water which had collected in the parking lot. The water was stored in tanker trucks pending laboratory analysis. Laboratory analysis and proof of disposal for this water are attached. As reported in #9 above, approximately 50-100 gallons of an extremely viscous resinous substance was sprayed onto the parking lot outside the building. This material has solidified and cannot be removed using normal means. An attempt to remove this substance will be made when the area is declared safe. Hanging window frames and other debris currently make the area unsafe to work in. The area is being stabilized.

It is assumed that considerable amounts of debris will be generated when building clean-up beings. The regulatory status of such materials will be determined after the shoring is complete and the inventory can be further evaluated.

It is not possible to estimate total response costs at this time. This information will be provided in a supplemental report.

12. **Corrective actions taken:**

The plant is not in operation due to considerable damage to the production building. Corrective actions will be instituted prior to start-up of manufacturing at the facility. These will be based on reports from forensic engineers, Reichhold engineers and OSHA.

13. **Additional measures taken to prevent recurrences:**

See #12 above.

14. **Entities involved in clean-up:**

Advanced Environmental Technologies, Inc.  
1 Eden Lane  
Flanders, N.J.  
(201) 347-7111

American Industrial Marine Services, Inc.  
P.O. Box 4048  
Dunellen, N.J.  
(908) 756-5200

O.H.M. Corporation  
16406 U.S. Route 224E  
Findlay, Ohio 45840  
(800) 537-9540

O'Brien and Gere Engineering  
P.O. Box 80308  
Raleigh, N.C. 27623  
(919) 469-0099

Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, N.J. 07105  
(201) 589-3709

15. Quantity, location, and date of samples:

In order to obtain a representative sample of waste water, samples were taken in two areas of the parking lot, as well as from each of the tanker trucks used for storage of this water. This water was analyzed for priority pollutants, and T.L.C.P. constituents. Copies of reports are attached.

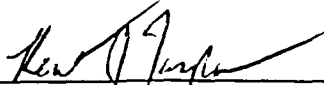
Analytical results for the resinous substance are also attached.

16. Results of analysis:

See #15 ABOVE

17. Financial responsibility certification:

I certify under penalty of law that the financial responsibility demonstrated pursuant to N.J.A.C. 7:1E4.5 and submitted to the Department pursuant to N.J.A.C. 7:1E4.4(a)9 is in full force and effect.



Kent Taylor  
Plant Manager

18. Supplemental information:

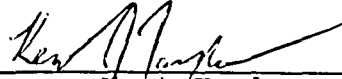
Not applicable

19. Other information requested by N.J.D.E.P.E.

Not applicable

20. **CERTIFICATION:**

I certify, under penalty of law, that the information provided in this document is true, accurate and complete to the best of my knowledge, information, and belief. I am aware that there are significant civil and criminal penalties, including fines or imprisonment or both, for submitting false, inaccurate or incomplete information.



---

Kent Taylor  
Plant Manager

**Reichhold Chemicals, Inc.**

Corporate Headquarters

P.O. Box 13582

Research Triangle Park, NC 27709-3582

**REICHHOLD**

February 5, 1992

Bureau of Discharge Prevention  
New Jersey Department of Environmental Protection  
CN 027  
Trenton, New Jersey 08625-0027

ATTENTION: Plan Submittal

RE: Reichhold Chemicals, Inc. - Newark, New Jersey  
DPCC and DCR Plans - Financial Assurance Submittal

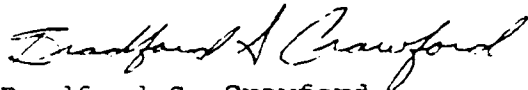
Dear Sir:

The Reichhold Chemicals, Inc. facility located on Doremus Avenue in Newark, New Jersey is required to submit a DPCC plan and a DCR plan by August 1, 1992 in accordance with N.J.A.C. 7:1E-4.6(b)2.

The facility experienced a release due to an explosion/fire on January 10, 1992. In order to comply with the confirmation report requirement in N.J.A.C. 7:1E-5.8(b)17., the enclosed insurance certificates are being submitted to demonstrate financial responsibility. The complete DPCC and DCR plans will be submitted consistent with N.J.A.C. 7:1E-4.6(b)2. at a later date.

If you have any questions concerning this submittal, please call me at (919) 990-7540.

Sincerely,



Bradford S. Crawford  
Regional Environmental Engineer  
Environmental Engineer

BSC/jwr

Enclosures

# TEECHES INSURANCE LIMITED

---

Victoria Hall, Victoria Street  
P.O. Box HM 1826  
Hamilton HM HX, Bermuda  
Tel: (809)292-4402 Telex: 3276 Kero BA  
Fax: (809)292-1563

## CERTIFICATE OF INSURANCE

Name: Reichhold Chemicals Inc.

Address: 400 Doremus Avenue  
Newark, NJ 07105  
U.S.A.

Policy Number: 1-10001-03

Policy Period: March 31, 1991 to March 31, 1992

Insurer: Teeches Insurance Limited

Address: P. O. Box HM 1826  
Hamilton HM HX  
Bermuda

Insured: Reichhold Chemicals Inc.

Address: 800 Capitola Drive  
Durham, NC 27709  
U.S.A.

1. Teeches Insurance Ltd. the Insurer as identified above, hereby certifies that it has issued liability insurance covering the following facility: Reichhold Chemicals Inc., 400 Doremus Avenue, Newark NJ 07105 for taking corrective action caused by discharges arising from operating the facility identified above.

The limits of liability are Sudden and Accidental Pollution \$1,000,000 per occurrence and \$2,000,000 annual aggregate, exclusive of legal defense costs. This coverage provided under Policy No. 1-10001-03. The effective date of said policy is March 31, 1991.

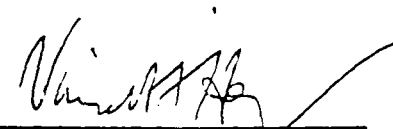
2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
- a. Bankruptcy or insolvency of the insured shall not relieve the Insurer or its obligations under the policy to which this certificate applies.
  - b. The Insurer is liable for the payment of amounts within any deductible applicable to the policy to the provider of corrective action, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms.
  - c. Whenever requested by the Department, the Insurer agrees to furnish to the Department a signed duplicate original of the policy and all endorsements.
  - d. Cancellation or any other termination of the insurance by the Insurer will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the insured or 60 days after a copy of such written notice is received by the insured or 60 days after a copy of such written notice is received by the Department whichever is later.
  - e. The insurance covers claims for any occurrence that commenced during the term of the policy that is discovered and reported to the Insurer within six months of the effective date of the cancellation or other termination of the policy.

I hereby certify that the wording of this instrument is identical to the wording in Appendix B of N.I.A.C. 7:1E and that the Insurer is licensed to transact the business of insurance in the State.

IN WITNESS WHEREOF, TEECHES INSURANCE LIMITED has caused this Certificate to be signed by an authorized officer at Hamilton, Bermuda.

Date

January 24 1992

  
Teeches Insurance Limited

# TEECHES INSURANCE LIMITED

---

Victoria Hall, Victoria Street  
P.O. Box HM 1826  
Hamilton HM HX, Bermuda  
Tel: (809)292-4402 Telex: 3276 Kero BA  
Fax: (809)292-1563

## ENDORSEMENT NO. 4

Effective Date: February 1, 1992

Name: Reichhold Chemicals Inc.

Address: 400 Doremus Avenue  
Newark, NJ 07105  
U.S.A.

Policy Number: 1-10001-03

Policy Period: March 31, 1991 to March 31, 1992

Insurer: Teeches Insurance Limited

Address: P. O. Box HM 1826  
Hamilton HM HX  
Bermuda

Insured: Reichhold Chemicals Inc.

Address: 800 Capitola Drive  
Durham, NC 27709  
U.S.A.

1. This endorsement certifies that the policy to which the endorsement is attached provides liability insurance covering the following facility: Reichhold Chemicals Inc., 400 Doremus Avenue, Newark, NJ 07105, U.S.A. for taking corrective action caused by discharges.

The limits of liability are Sudden and Accidental Pollution \$1,000,000 per occurrence and \$2,000,000 annual aggregate, exclusive of legal defense costs. This coverage provided under Policy No. 1-10001-03. The effective date of said policy is March 31, 1991.



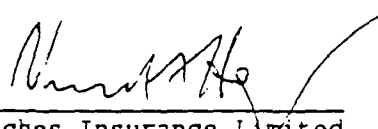
2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy provided, however, that any provisions inconsistent with subsections (a) through (e) of this Paragraph 2 and hereby amended to conform with subsections (a) through (e):
- a. Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.
  - b. The Insurer is liable for the payment of amounts within any deductible applicable to the policy to the provider of corrective action, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms.
  - c. Whenever requested by the Department, Teeches Insurance Limited agrees to furnish to the Department a signed duplicate original of the policy and all endorsements.
  - d. Cancellation or any other termination of the insurance by the Insurer will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the insured or 60 days after a copy of such written notice is received by the insured or 60 days after a copy of such written notice is received by the Department whichever is later.
  - e. The insurance covers claims for any occurrence that commenced during the term of the policy that is discovered and reported to the Insurer within six months of the effective date of the cancellation or termination of the policy.

I hereby certify that the wording of this instrument is identical to the wording in Appendix B of N.I.A.C. 7:1E and that the Insurer is licensed to transact the business of insurance in New Jersey.

IN WITNESS WHEREOF, TEECHES INSURANCE LIMITED has caused this endorsement to be signed by an authorized officer at Hamilton, Bermuda.

Date

January 24, 1992

  
for Teeches Insurance Limited

001239/BES/2

842899892

*u. Naugelis*

**Reichhold Chemicals, Inc.**  
Coating Polymers & Resins Division  
400 Doremus Avenue  
Newark, NJ 07105

**REICHHOLD**

May 4, 1992

Mr. Charles E. Fitzsimmons  
U.S. EPA  
Region II  
Edison, New Jersey 08837

Dear Mr. Fitzsimmons:

As per your letter of April 28, 1992, the following is being included in this package for your information.

- 1) waste profiles
- 2) manifests
- 3) work plans
- 4) health and safety plan - without attachments
- 5) A final report/analysis of material disposition
- 6) Proposed work plans: Are still being formulated.

If you have further questions, please do not hesitate to call Bob Naugelis. I have been reassigned to Chicago. Bob is now the acting Plant Manager.

Sincerely,

  
Kent Taylor  
Plant Manager

KT/glm  
encl.

(201) 589-3709  
(201) 817-9173 (Facsimile)

842899893



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II  
EDISON, NEW JERSEY 08837

Mr. Kent Taylor  
Plant Manager  
Reichhold Chemical Company  
400 Doremus Ave.  
Newark, N.J.

28 APR 1992

Dear Mr. Taylor,

As per our discussions conducted in Mr. Naujelis' office, at your facility, on April 10, 1992, it was mutually agreed that you would provide the necessary documentation to support your Phase II cleanup activities. Since you had proceeded and essentially completed Phase II activities, without notification to this office, we determined that this documentation is critical for me to track your compliance status.

It is imperative that you provide as soon as possible the documentation that would support your compliance with EPA's regulations. Please provide all waste profiles, manifests, work plans, health and safety plans, final reports governing disposition of all materials from the site and also proposed work plans which would govern further remedial plans. It is anticipated that remedial planning efforts are presently underway to study potential soil and groundwater contamination which may have occurred as a result of the explosion.

Should you have any questions please feel free to contact either myself or our attorney assigned to this case, Ms. Amelia Wagner. Ms. Wagner can be reached at (212) 264-9195. Your cooperation is appreciated.

Sincerely,

A handwritten signature in cursive script, appearing to read "C.E. Fitzsimmons".

Charles E. Fitzsimmons  
Federal On-Scene Coordinator

cc; J.Daloia, EPA  
A.Wagner, EPA  
J.Rooney, EPA

842899894

I AND II. WASTE PROFILES AND MANIFESTS

842899895

# RINECO

629 Vulcan Road • Haskell  
P.O. Box 729, Benton, AR 72015

Office (501) 778-9089 FAX (501) 778-8505

## FOR OFFICE USE ONLY

Account Rep: \_\_\_\_\_

Control #: \_\_\_\_\_

Approved \_\_\_\_\_ Rejected \_\_\_\_\_

### WASTE MATERIAL PROFILE SHEET

In accordance with the Federal and State regulations, it is necessary for the Generator of hazardous waste to properly identify the waste for their records as well as to supply the disposal facility with the information necessary to handle the waste. The information outlined below must be complete, and signed by the generator.

Generator Name: Reichhold Chemicals, Inc USEPA I.D. NO.: NJD 092217892  
Facility Address: 400 Doremus Avenue State I.D. NO.: N/A  
Newark, NJ 07105 Phone: 201. 589. 3709  
Fax: 201. 817. 9173  
Technical Contact: BOB NAUJELIS Title: \_\_\_\_\_  
24 Hour Emergency Contact: \_\_\_\_\_ 24 Hour Emergency Phone #: \_\_\_\_\_

#### I. GENERAL INFORMATION

Material Name: \_\_\_\_\_ Anticipated Monthly Volume Clean Up  
Generating Process: \_\_\_\_\_  
Method of Shipment: ☒ Bulk Solid ☐ Bulk Liquid ☐ Steel Drums ☐ Other: Roll OFFS

#### II. MATERIAL COMPOSITION

COMPONENT	CONCENTRATION
Bisphenol A	.01 - .03
Hexamethylenetetramine	.01 - .03
Paraformaldehyde	.12 - .16
Benzic Acid	.01 - .05
Pentaerythritol	.03 - .08
Pelargonic Acid	.01 - .02
Benzoguanamine	0 - .002
Isophthalic Acid	.14 - .18
Maleic Anhydride	.02 - .05
Phthalic Anhydride	.01 - .04
PTBBA	.0005 - .001
Trimet	.01 - .03
Sanitizer 9 (OPTSA)	.20 - .25
Urea (NON-HAZ)	.03 - .06
PEG 3350	.001 - .002
Neville C115	.015 - .03
Bakelite CFM-2400	.002 - .003
UCAR CL-2500 (Phenolic Resin)	.003 - .005
Betaprene BC115 (Hydrocarbon Resin)	.015 - .03
Glacial Methacrylic Acid	.006 - .01
Trimellitic Anhydride	.03 - .06
Chlorendic Anhydride	.03 - .06

100%

#### III. PHYSICAL CHARACTERISTIC (At 70° F)

Physical State: ☒ Solid ☐ Liquid ☐ Semi-Solid  
Viscosity: ☐ Low ☐ Medium ☒ High  
Odor: ☐ None ☒ Mild ☐ Strong Describe \_\_\_\_\_  
Top \_\_\_\_\_ % Describe \_\_\_\_\_  
Layering: \_\_\_\_\_  
Bottom \_\_\_\_\_ % Describe \_\_\_\_\_  
Density \_\_\_\_\_ pH \_\_\_\_\_ Flash Point (°F) \_\_\_\_\_  
PCB's \_\_\_\_\_ Cyanide \_\_\_\_\_ Sulfide \_\_\_\_\_ Phenols \_\_\_\_\_

#### V. OTHER HAZARDOUS CHARACTERISTICS

Does material exhibit any of the following properties?  
☐ None ☐ Water Reactive ☐ Pyrophoric  
☐ Shock-Sensitive ☐ Explosive ☐ Other: \_\_\_\_\_  
☐ Peroxides  
Is material subject to a land disposal restriction?  
☐ Yes ☐ No If yes, specify: \_\_\_\_\_

#### IV. RECLAMATION OR FUELS

BTU/LB: \_\_\_\_\_ Ash: \_\_\_\_\_ % Water: \_\_\_\_\_ %  
Total Chlorine: \_\_\_\_\_ % Settleable Solids: \_\_\_\_\_ %

#### VI. SHIPPING INFORMATION

DOT Hazardous Material: ☒ Yes ☐ No E.R. Guide No. 31  
Proper Shipping Name: Hazardous Waste Solid, N.O.S.  
Hazard Class: ORM-2 UN or NA No. 9189 RQ: ☐ Yes ☐ No  
USEPA Hazardous Waste? ☒ Yes ☐ No  
Waste ID No.(s): U190, U041, U147

842899896

# TC Rule Certification / Recertification Form

**CHARACTERISTICS OF HAZARDOUS WASTE:** Indicate if this waste contains any of the following characteristics based on criteria mandated by 40 CFR 261.21, 261.22, 261.23 and 261.24.

(Check One)		Regulatory Threshold Level	Analytical Data	Generator's Knowledge
___ D001	Characteristic of Ignitability	<140°F	_____	_____
___ D002	Characteristic of Corrosivity	≤ 2 or ≥ 12.5	_____	_____
___ D003	Characteristic of Reactivity	*	_____	_____

\* As defined by 40 CFR 261.21

* (Check One) If exceeds regulatory level				* (Check One) If exceeds regulatory level					
Constituent	Regulatory Threshold Level, ppm	Analytical Data, ppm	Generator's Knowledge	Constituent	Regulatory Threshold Level, ppm	Analytical Data, ppm	Generator's Knowledge		
___ D004 (Arsenic)	5.0	_____	_____	___ D026 Cresol	200.0	_____	_____		
___ D005 (Barium)	100.0	_____	_____	___ D027 1,4- Dichlorobenzene	7.5	_____	_____		
___ D006 (Cadmium)	1.0	_____	_____	___ D028 1,2- Dichloroethane	0.5	_____	_____		
___ D007 (Chromium)	5.0	_____	_____	___ D029 1,1- Dichloroethylene	0.7	_____	_____		
___ D008 (Lead)	5.0	_____	_____	___ D030 2,4- Dinitrotoluene	0.13	_____	_____		
___ D009 (Mercury)	0.2	_____	_____	___ D031 Heptachlor (and its hydroxide)	0.008	_____	_____		
___ D010 (Selenium)	1.0	_____	_____	___ D032 Hexachlorobenzene	0.13	_____	_____		
___ D011 (Silver)	5.0	_____	_____	___ D033 Hexachlorobutadiene	0.5	_____	_____		
___ D012 Ednn	0.02	_____	_____	___ D034 Hexachloroethane	3.0	_____	_____		
___ D013 Lindane	0.4	_____	_____	___ D035 Methyl ethyl ketone	200.0	_____	_____		
___ D014 Methoxychlor	10.0	_____	_____	___ D036 Nitrobenzene	2.0	_____	_____		
___ D015 Toxaphene	0.5	_____	_____	___ D037 Pentachlorophenol	100.0	_____	_____		
___ D016 2,4-D (2,4 Dichloro- phenoxyacetic acid.)	1.0	_____	_____	___ D038 Pyridine	5.0	_____	_____		
___ D017 2,4,5 TP Silvex	1.0	_____	_____	___ D039 Tetrachloroethylene	0.7	_____	_____		
___ D018 Benzene	0.5	_____	_____	___ D040 Trichloroethylene	0.5	_____	_____		
___ D019 Carbon Tetrachloride	0.5	_____	_____	___ D041 2,4,5- Trichlorophenol	400.0	_____	_____		
___ D020 Chlordane	0.03	_____	_____	___ D042 2,4,6- Trichlorophenol	2.0	_____	_____		
___ D021 Chlorobenzene	100.0	_____	_____	___ D043 Vinyl Chloride	0.02	_____	_____		
___ D022 Chloroform	5.0	_____	_____						
___ D023 o-Cresol	200.0	_____	_____						
___ D024 m-Cresol	200.0	_____	_____						
___ D025 p-Cresol	200.0	_____	_____						

\* As defined by the TCLP (Method 1311), EP Toxicity is no longer acceptable.

**"LISTED" Hazardous Wastes:** Indicate if this waste also contains any listed hazardous wastes coded in 40 CFR 261.31, 261.32 and 261.33 by including the appropriate EPA hazardous waste code(s).

U041      U147      U190

## GENERATOR CERTIFICATION:

The above information is to be held confidential and is true and accurate to the best of my knowledge.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
Print Name: \_\_\_\_\_ Title: \_\_\_\_\_

THIS CERTIFICATION / RECERTIFICATION IS REQUIRED FOR EACH PROFILE.  
ORIGINAL SIGNATURE REQUIRED

842899897



**OLDOVER**  
CORPORATION

P.O. Box 278  
Ashland, Virginia 23005  
Telephone (804) 798-7981

WASTE PROFILE SHEET CODE

YES ☐ NO ☒ TS

**A GENERAL INFORMATION**

GENERATOR NAME: REICHOLD CHEMICALS, INC. TRANSPORTER: OLDOVER CORP.  
FACILITY ADDRESS: 400 DOREMUS AVENUE TRANSPORTER PHONE: 804-798-7981  
NEWARK, NJ 07105 GENERATOR USEPA I.D. ND.D.0.9.2.2.1.7.8.9.3  
GENERATOR STATE I.D. SC.0000  
TECHNICAL CONTACT: Mike Baxi TITLE: Env. Eng. PHONE: 201-589-3701  
NAME OF WASTE: MONOMER FROM Tank-119  
PROCESS GENERATING WASTE: OFF SPEC PREMIX SOLUS

**B PHYSICAL CHARACTERISTICS OF WASTE**

COLOR: CLEAR LIQUID  
ODOR: ☐ NONE ☐ MILD ☒ STRONG  
DESCRIBE: METHYL METHACRYLATE  
PHYSICAL STATE @ 70°F: ☐ SOLID ☐ SEMI-SOLID ☒ LIQUID  
LAYERS: ☐ MULTILAYERED ☐ BILAYERED ☒ SINGLE PHASED  
FREE LIQUIDS: ☒ YES 100% VOLUME 100%  
FLASH POINT: ☒ < 70°F ☐ 70°F - 100°F ☐ 101°F - 130°F ☐ 140°F - 200°F  
☐ > 200°F ☐ NO FLASH ☐ EXACT

**C CHEMICAL COMPOSITION (TOTALS MUST ADD TO 100%)**

ACRYLIC Acid 16.3  
Hydroxy Acrylate 10.0  
Methyl methacrylate 56  
Styrene 18  
Trimethyl Amine 2-3  
CHROMIUM-HEX (C + H) \_\_\_\_\_  
**D METALS** ☐ TOTAL (PPM) ☐ EPA EXTRACTION PROCEDURE (mg/L)  
ARSENIC (As) < 5 SELENIUM (Se) < 1.0  
BARIUM (Ba) < 100 SILVER (Ag) < 5.0  
CADMIUM (Cd) < 1 COPPER (Cu) < 5.0  
CHROMIUM (Cr) < 5 NICKEL (Ni) < 5.0  
MERCURY (Hg) < 0.2 ZINC (Zn) < 5.0  
LEAD (Pb) < 5 THALLIUM (Tl) < 1.0

**F SHIPPING INFORMATION**

DOT HAZARDOUS MATERIAL? ☒ YES ☐ NO  
PROPER SHIPPING NAME: FLAMMABLE LIQUID  
HAZARD CLASS: UN-1993 ID NO.: \_\_\_\_\_  
METHOD OF SHIPMENT: ☒ BULK LIQUID ☐ DRUM (TYPE/SIZE) \_\_\_\_\_  
ANTICIPATED VOLUME: 3000 GALS.  
PER: ☒ ONE TIME ☐ WEEK ☐ MONTH ☐ QUARTER ☐ YEAR  
**G HAZARDOUS CHARACTERISTICS**  
REACTIVITY: ☐ NONE ☐ PYROPHORIC ☐ SHOCK SENSITIVE  
☐ EXPLOSIVE ☐ WATER REACTIVE ☐ OTHER \_\_\_\_\_  
OTHER HAZARDOUS CHARACTERISTICS:  
☐ NONE ☐ RADIOACTIVE ☐ ETHOLOGICAL  
☐ PESTICIDE MANUFACTURING WASTE ☐ OTHER \_\_\_\_\_  
USEPA HAZARDOUS WASTE? ☒ YES ☐ NO  
USEPA HAZARDOUS CODE(S): \_\_\_\_\_  
STATE HAZARDOUS WASTE? ☒ YES ☐ NO  
STATE CODE(S): \_\_\_\_\_

**H SPECIAL HANDLING INFORMATION**

CERTIFICATE OF DISPOSAL  
☐ ADDITIONAL PAGE(S) ATTACHED

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS IS COMPLETE AND ACCURATE, AND THAT ALL KNOWN OR SUSPECTED HAZARDS HAVE BEEN DISCLOSED.

AUTHORIZED SIGNATURE: Mike Baxi TITLE: Environmental Eng. DATE: 04/19/1992

842899898

Amendment X New

AUTHORIZATION REQUEST FORM

APPROVED

South Carolina Department of Health and Environmental Control  
Bureau of Solid and Hazardous Waste (803) 734-5200

☒ Landfill ☐ Reclaim  
☐ Recycle ☐ Incinerate  
☐ Landfarm ☐ Energy Recover  
☐ Other 8.3.17.92 896083

Authorization Number: PW - 02279 - 4101

To be entered  
by TSD Facility

Generator Information:

Generator ID # NSD 092V17892 Name REICHOLD CHEMICAL

Address 400 DOREMUS AVE City NEWARK State NJ Zip Code 07105

Official Contact BOB NAUSELLS MIKE BART Title ENV ENR Telephone (201) 589-3709 ESSEX

Treatment, Storage, or Disposal Facility Information:

Generator declares that this waste is  
not "derived from" or "mixed with" any  
RCRA hazardous waste, ~~other than~~ County

Facility EPA ID # SCD070375985 Name GSX SERVICES OF S.C. INC.

Line # (This line # will always represent this specific waste stream.) GENERATOR DECLARES THAT THIS  
WASTE IS NON-HAZARDOUS

CLEAN UP WASTE (CHEMICALS) (7777)  
Description of Hazardous Waste

7777

EPA/DHEC Waste Codes

DOT Hazard Class

Process Producing Waste:  
VIRGIN CHEMICALS CAUGHT IN A  
PIPE AND EXPLOSION ON-SITE. FIRE  
STARTED IN PROCESS AREA. THESE CHEMICALS  
WERE STORED IN SAFE AND MATERIAL AREA.

Enter Quarter for One-Time Disposal:    /    Qtr/yr.

Handling Method: D 8 1

If Multiple Shipments Enter Frequency Here:    ☒ times/yr.

Volume: (lbs/yr. only) 400,000

Physical State of Waste @ 70°F

Flash Point (cc)

1. ☒ solid 2. ☐ liquid 3. ☐ N/A

1. ☐ N/A 2. ☐ <60°F 3. ☐ 60-140°F 4. ☒ >140°F

For DHEC Use Only:

Date Received         

Notes:   

DHEC 1969 Rev. (8/86)

3-26-92

2279-4101

Page 1

842899899



# AUTHORIZATION REQUEST FORM (con't)

Facility Use Only:


Packaging for Shipment: ☐ In Drums (size) ☐ ☒ In Bulk ☐ Other

Method of Transportation: ☐ Railroad tanker ☒ truck ☐ Other ☐ Specific Gravity: ☐

Viscosity @ 70°F: ☐ Low ☐ Medium ☒ High Layering: ☒ None ☐ Bilayered ☐ Multilayered

Suspended Solids: % by weight or volume, Specify exact % N/A Dissolved Solids: by % weight, Specify exact % N/A

Thousands of Btu's/lb, Specify: N/A Organically Bound Sulfur (wt %): N/A Organically Bound Chloride: N/A

Organically Bound Nitrogen (Wt %) N/A Toxicity: ☐ High ☐ Medium ☐ Low ☒ Unknown Ash %: N/A

Affinity for Water: ☒ Hydrophilic ☐ Lipophilic pH (if hydrophilic): 3

Visual Description of waste: WHITE PAPER IN BURNT PAPER BAGS + PALLETS

Constituents: List specific constituents by name and corresponding percentage in waste stream.

Volatile Organics	%	Non Volatile Organics	%	Acid or Alkalis	%	Salts & Inorganics	%
				Generator declares that this waste is not "derived from" or "mixed with" any RCRA hazardous waste, other than:		<u>BAGS, PALLETS</u>	
						<u>WOOD PIECES, ETC</u>	
						<u>COLORED BOXES</u>	
						<u>GREEN BAGS</u>	<u>5</u>
				GENERATOR DECLARES THAT THIS WASTE IS NON-HAZARDOUS (117)		<u>RAW VIRGIN</u>	
						<u>CHEMICALS</u>	<u>95</u>
						<u>(SEE ATTACHED)</u>	

Water: 45 %

3-26-92  
2279-4101

# AUTHORIZATION REQUEST FORM (con't)

Metallic: (total metals not EP Toxicity Test)

Toxics:

As <u>4.10</u> ppm	Cr <sup>+3</sup> <u>4.10</u> ppm	Ag <u>4.10</u> ppm	Fe <u>/</u> ppm
Ba <u>0.42</u> ppm	Cr <sup>+6</sup> <u>4.10</u> ppm	Ni <u>/</u> ppm	Sb <u>/</u> ppm
Cd <u>4.10</u> ppm	Hg <u>4.01</u> ppm	Cu <u>/</u> ppm	Mn <u>/</u> ppm
Pb <u>0.37</u> ppm	Se <u>0.12</u> ppm	Ti <u>/</u> ppm	Co <u>/</u> ppm
Zn <u>—</u> ppm	<u>—</u> ppm	<u>—</u> ppm	<u>—</u> ppm

Cyanide	<u>/</u>	ppm
Pesticides	<u>/</u>	ppm
Carcinogens	<u>/</u>	ppm
Other Toxics	<u>/</u>	ppm

Other Information : \_\_\_\_\_

## Certification :

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature : Robert Navaj  
 Print Name : ROB NAVAJ

Date Submitted : 3/11/92  
 Title : ENV ENR

## TSD/ NOTICE OF ACCEPTANCE:

As required by South Carolina Regulation R.61-79.264.12(b) and R.61-79.265.12(c), based on the information presented in this document, this facility has the appropriate permit(s) for and will accept the waste as described on this form.

Signature : J J Perma  
 Print Name : F J PERMA

GENERATOR DECLARES THAT THIS  
 WASTE IS NON-HAZARDOUS  
 (7777)

Date Submitted : 3-26-92  
 Title : Chief Chemist

2279-4101

PLEASE COMPLETE THIS FORM AND RETURN TO GSX, PINWOOD, SC

GENERATOR NAME: REICHOLD CHEMICALS

WASTE DESCRIPTION: CLEAN-UP WASTE (CHEMICALS)

PROCESS PRODUCING WASTE AT POINT OF GENERATION: FIRE & EXPLOSION

EPA/DHEC CODE(S): ( ) ( ) GSX CODE # PW- (if one has been assigned)

NO YES

- ☒ Does this waste contain more than 49 ppm PCB?
- ☒ Does this waste contain dioxin?
- ☒ Does this waste contain over 1000 ppm of the Halogenated Organics listed in Appendix III of 268, regulated under 268.32?
- ☒ Could this waste be properly classified as ignitable (D001) as defined in 40 CFR 261.21?
- ☒ Does this waste contain free liquid, with a flashpoint less than 140°F?
- ☒ Could this waste be properly classified as reactive (D003) as defined in 40 CFR 261.23?
- ☒ Is this waste an oxidizer as defined by 49 CFR 173.151?
- ☒ Does this waste contain cyanide greater than 250 ppm as detected by EPA Method 9010?
- ☒ Does this waste contain sulfide greater than 500 ppm as detected by EPA Method 9030?
- ☒ Could this waste be properly classified as F020, F021, F022, F023, F026, F027 as defined in 40 CFR 261.31? (See attachment #1)
- ☒ Is this waste restricted from land disposal per the Hazardous and Solid Waste Amendments of 1984, effective November 8, 1986, and expanded November 8, 1988? These wastes include F001, F002, F003, F004, F005, as defined in Attachment #2.
- ☒ Has anything been added to solidify this waste?
- ☒ If yes, has the waste been stabilized in such a way to pass the unconfined compressive strength as determined by the test given in the statutory Interpretive Guidance of June 11, 1986.
- ☒ If yes, did the solidification agent used contain greater than one percent total organic carbon?
- ☒ Has anything been added to this waste to reduce the level of F001 thru F005 listed solvents or Halogenated Organic compound listed in Appendix III of 268, regulated under 268.32?
- ☒ Has this waste been treated to reduce the level of F001 thru F005 listed solvents or Halogenated Organic compounds listed in Appendix III of 268, regulated under 268.32?
- ☒ I have studied the "First Third" waste listings given in 268.10 (see attachment 3) and certify that none of these descriptions apply to this waste, except those declared on page one of the ARF.
- ☒ Is this waste derived from or mixed with any waste listed in the "First Third" 268.10?
- ☒ Is this waste derived from or mixed with any RCRA hazardous waste other than those listed on page one of this ARF?

If so, state the hazardous waste codes from which this waste is derived or mixed with.

#### CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

GENERATOR SIGNATURE: Robert Nausele

PRINT NAME: BOB NAUSELE

DATE: 3-11-92

Generator declares that this waste is not "derived from" or "mixed with" any RCRA hazardous waste, other than

GENERATOR DECLARES THAT THIS WASTE IS NON-HAZARDOUS

(777)

3-26-92

22 79-4101

842899902

REICHOLD CHEMICALS 400 DOREMUS AVE NEWARK, NJ

CLEAN-UP WASTE (CHEMICALS)

LIST OF CHEMICALS

<u>SOLID</u>	<u>COMMON NAME</u>	<u>C.A.S. NUMBER</u>
YES	AZOISOBUTYRONITRILE .	78-67-1
YES	HYDROCARBON RESIN	68131-87-3
YES	HEXAMETHYLENETETRAMINE	100-97-0
YES	MELAMINE	108-78-1
YES	HYDROGENATED DIPHENYLOLPROPANE	unknown
YES	METHACRYLIC ACID	79-41-4
YES	TRIMETHYLOLETHANE	77-85-0
YES	FATTY ACIDS C16-C19	67701-03-5
YES	PHENOLIC RESIN	54579-447-1
YES	BETAPRENE BC115D HYDROCARBON. RESIN	unknown
YES	UREA	57-13-6
YES	PENTAERYTHRITOL	115-77-5
YES	TRIMELLITIC ANHYDRIDE	552-30-7
YES	PARAFORMALDEHYDE	30525-89-4
YES	P-TERT BUTYL BENZOIC ACID	98-73-7
YES	BENZOIC ACID	65-85-0
YES	ORTHO-PARA TOLUENE SULFONAMIDE	8013-74-9
YES	CHLORENDIC ANHYDRIDE	115-27-5
YES	BENZOQUANAMINE .	unknown
YES	POLYETHYLENE GLYCOL	25322-68-3
YES	ADIPIC ACID .	124-04-9
YES	TRIMETHYLOLPROPANE	77-99-6
YES	NEOPENTYL GLYCOL	126-30-7
YES	DIATOMACEOUS EARTH.	68855-54-9

GENERATOR DECLARES THAT THIS  
WASTE IS NON-HAZARDOUS  
(777)

Generator declares that this waste is  
not "derived from" or "mixed with" any  
RCRA hazardous waste, ~~otherwise~~.

02279-4101

842899903

# TC Rule Certification / Recertification Form

Generator Name: REICHHOLD CHEMICALS

EPA ID#: NYD 092217R92

Location: 400 DOREMUS AVE NEWARK, NJ 07105

Profile #: CLEAN-UP WASTE (CHEMICALS)

**CHARACTERISTICS OF HAZARDOUS WASTE:** Indicate if this waste contains any of the following characteristics based on criteria mandated by 40 CFR 261.21, 261.22, 261.23 and 261.24.

		Regulatory Threshold Level	(Check One)		Scientific Data	(Check One) Generator's Knowledge	Actual Value
			Yes	No			
D001	Characteristic of Ignitability	< 140 <sup>OF</sup>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	0
D002	Characteristic of Corrosivity	≤ 2 or ≥ 12.5		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		3
D003	Characteristic of Reactivity			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		NER

Constituent	*Regulatory Threshold Level, ppm		(Check One)		Scientific Data	(Check One) Generator's Knowledge	Actual Value (ppm)
			Yes	No			
D004 (Arsenic)	5.0	Generator declares that this waste is not "listed from" or "mixed with" any RCRA hazardous waste, or		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		4.10
D005 (Barium)	100.0			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		.42
D006 (Cadmium)	1.0			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		4.10
D007 (Chromium)	5.0			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		4.10
D008 (Lead)	5.0			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		.37
D009 (Mercury)	0.2			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		.01
D010 (Selenium)	1.0			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		0.12
D011 (Silver)	5.0			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		.10
D012 Edrin	0.02			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
D013 Lindane	0.4			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
D014 Methoxychlor	10.0			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
D015 Toxaphene	0.5			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
D016 2,4-D	10.0			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
(2,4-Dichloro-phenoxyacetic acid.)							
D017 2,4,5-TP Silvex	1.0			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
D018 Benzene	0.5	GENERATOR DECLARES THAT THIS WASTE IS NON-HAZARDOUS (777)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		.05
D019 Carbon Tetrachloride	0.5			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		.05
D020 Chlordane	0.03			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
D021 Chlorobenzene	100.0			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		.05
D022 Chloroform	6.0			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		.05
D023 o-Cresol	200.0			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		4.10
D024 m-Cresol	200.0			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		4.10
D025 p-Cresol	200.0			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		4.10

- Continued -

842899904

02279-4101

Constituent	*Regulatory Threshold Level, ppm	(Check One)		Scientific Data	(Check One) Generator's Knowledge	Actual Value
		Yes	No			
D026 Cresol	200.0		✓	✓		2.10
D027 1,4- Dichlorobenzene	7.5		✓	✓		.10
D028 1,2- Dichloroethane	0.5		✓	✓		.05
D029 1,1- Dichloroethylene	0.7		✓	✓		.05
D030 2,4- Dinitrotoluene	0.13		✓	✓		.10
D031 Heptachlor (and its hydroxide)	0.008		✓		✓	
D032 Hexachlorobenzene	0.13		✓	✓		.10
D033 Hexachlorobutadiene	0.5		✓	✓		.10
D034 Hexachloroethane	3.0		✓	✓		.10
D035 Methyl ethyl ketone	200.0		✓	✓		.05
D036 Nitrobenzene	2.0		✓	✓		.10
D037 Pentachlorophenol	100.0		✓	✓		.50
D038 Pyridine	5.0		✓		✓	
D039 Tetrachloroethylene	0.7		✓	✓		.05
D040 Trichloroethylene	0.5		✓	✓		.05
D041 2,4,5- Trichlorophenol	400.0		✓	✓		.10
D042 2,4,6- Trichlorophenol	2.0		✓	✓		.10
D043 Vinyl Chloride	0.2		✓	✓		.10

\* As defined by the TCLP (Method 1311), EP Toxicity is no longer acceptable.

"LISTED" Hazardous Wastes: Indicate if this waste also contains any listed hazardous wastes coded in 40 CFR 261.31, 261.32 and 261.33 by including the appropriate EPA hazardous waste code(s).

\_\_\_\_\_  
\_\_\_\_\_

GENERATOR CERTIFICATION:

I hereby certify that all information submitted on this form and all attached documents are true and accurate. In the event that this form is not fully completed, I authorize Laidlaw Environmental Services to conduct necessary testing at my expense to properly complete the form.

Signature: ✓ Robert Naiselis Date: 3/11/92  
Print Name: BOB NAISELIS Title: ENV ENG

THIS CERTIFICATION/RECERTIFICATION IS REQUIRED FOR EACH PROFILE.

ORIGINAL SIGNATURE REQUIRED



19+3=22 Riverco  $\rightarrow$  (22)

1 - Oldover (T-119)

18-3  
=15 GSX  $\rightarrow$  (15)

1 - Waste conveying  
(water) -



UNIFORM

## PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

Bureau of Waste Management

P. O. Box 8550

Harrisburg, PA 17105-8550

## OFFICIAL PENNSYLVANIA MANIFEST FORM

FOR SHIPMENT OF HAZARDOUS, INFECTIOUS  
AND CHEMOTHERAPEUTIC WASTE.Form approved.  
OMB No. 2050-0039  
Expires 9-30-92

ER-WM-51 REV. 1/91

UNIFORM HAZARDOUS  
WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest  
Document No.2. Page 1  
of 1Information in the shaded areas  
is not required by Federal law  
but is required by State law.

3. Generator's Name and Mailing Address

Reichold Chemical Inc.  
400 Doremus Ave.  
Newark, NJ 07105

A. State Manifest Document Number

PAC 5756623

B. State Gen. ID

SAME

4. Generator's Phone (201) 589-3709

5. Transporter 1 Company Name

S-J Transportation Co.

6. US EPA ID Number

NJ D 07 16 299 76

C. State Trans. ID

PA- AH 00 15

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone (609) 769-27431

E. State Trans. ID

PA- 00 15

9. Designated Facility Name and Site Address

Waste Conversion Inc.  
2869 Sandstone Drive  
Hatfield, PA 19440

10. US EPA ID Number

PA D 08 56 90 592

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone (215) 822-8996

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

RQ, Waste Flammable Liquid NOS  
Flammable Liquid UN1993  
(thinner and water)

D001

12. Containers

No.

Type

13. Total  
Quantity14. Unit  
Wt/Vol

15. Waste No.

0 0 1

T T

0 5 0 0 0

G

D-0-0-0-0-0

J. Additional Descriptions for Materials Listed Above

Lab Pack

Physical State

Lab Pack

Physical State

a.

L

WL26839 (I)

c.

L

L

K. Handling Codes for Wastes Listed Above

a. S02

c.

b.

L

L

d.

L

L

b.

d.

15. Special Handling Instructions and Additional Information

Emergency Contact: R NAUSELI  
Emergency Phone: 201 589 3709  
Emergency Guide No.: 27

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

ROBERT NAUSELI

Signature

Robert Nauseli

MONTH DAY YEAR

01 31 92

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

JERRY L DAVIS

Signature

Jerry L Davis

MONTH DAY YEAR

01 31 92

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

MONTH DAY YEAR

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

PAUL CONNELL

Signature

Paul Connell

MONTH DAY YEAR

01 31 92





STATE OF ARKANSAS  
Department of Pollution Control and Ecology  
P. O. Box 8913 Little Rock, Arkansas 72219-8913  
Telephone 501-562-7444

1

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's ID No. NJD092217892		Manifest Document No. 178112		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address Reichhold Chemicals, Inc. 400 Doremus Avenue Newark, NJ 07105 4. Generator's Phone (201) 589-3709						A. State Manifest Document Number AR- 552565 B. State Generator's ID							
5. Transporter 1 Company Name NAPPI TRUCKING CORP 6. US EPA ID Number NJ D000813477						C. State Transporter's ID PC 1009 H 319 D. Transporter's Phone 908-566-3000							
7. Transporter 2 Company Name						E. State Transporter's ID PC - - - - H - - - F. Transporter's Phone							
8. Designated Facility Name and Site Address Rimco 1007 Vulcan Rd. - Haskell Benton, AR. 72015 10. US EPA ID Number ARD981057870						G. State Facility's ID H. Facility's Phone 501778-9089							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. Hazardous Waste Solid, N.O.S. ORM-E NA9189						No. Type						U041, U147, U190	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above a. 9203-1433 ERG #31 PHTHALIC ANHYDRIDE MALEIC ANHYDRIDE, HEXAMINE if no alternate TSDF, return to generator						K. Handling Codes for Wastes Listed Above EMERGENCY RESPONSE INFORMATION: Bob Naujels 201-589-3709							
15. Special Handling Instructions and Additional Information DECALH 20707 NJ DEP-S 10342													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name MIKE BAXI						Signature Mike Baxi						Month Day Year 05 04 92	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name JOSEPH SCIAME						Signature Joseph Sciame						Month Day Year 05 04 92	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name						Signature						Month Day Year	
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name													
Signature													
Month Day Year													

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

842899908



STATE OF ARKANSAS  
Department of Pollution Control and Ecology  
P. O. Box 8913 Little Rock, Arkansas 72219-8913  
Telephone 501-562-7444

1

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>Reichhold Chemicals, Inc.</b> <b>400 Doremus Avenue</b> <b>(201) 589-3709</b>		Attn: Bob Naujels <b>Newark, NJ 07105</b>		A. State Manifest Document Number <b>AR- 552566</b> 2	
4. Generator's Phone		6. US EPA ID Number <b>NAPPI TRUCKING CORP</b> <b>WJTD000813477</b>		C. State Transporter's ID <b>PC 1009 H 319</b>	
5. Transporter 1 Company Name		8. US EPA ID Number		D. Transporter's Phone <b>908-566-3000</b>	
7. Transporter 2 Company Name		10. US EPA ID Number		E. State Transporter's ID <b>PC --- H ---</b>	
Designated Facility Name and Site Address <b>Rineco</b> <b>1007 Vulcan Rd. - Haskell</b> <b>Benton, AR. 72015</b>		10. US EPA ID Number <b>ARD981057870</b>		F. Transporter's Phone <b>501778-9089</b>	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. <b>Hazardous Waste Solid, N.O.S.</b> <b>ORM-E NA9189</b>		No. <b>XX1</b>	Type <b>CMX</b>	<b>50000</b>	<b>P</b>
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above <b>a. 9205-1435 ERO W31</b>		K. Handling Codes for Wastes Listed Above <b>EMERGENCY RESPONSE INFORMATION:</b> <b>Bob Naujels</b> <b>201-589-3709</b>			
if no alternate TSDF, return to generator					
15. Special Handling Instructions and Additional Information <b>DECAL # 14745 / NJ DEPS-10342</b>					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name <b>MIKE BAXI</b>		Signature <i>Mike Baxi</i>		Month Day Year <b>050492</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature <i>John Sneed</i>		Month Day Year <b>10151492</b>	
Printed/Typed Name <b>John SNEED</b>		Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Month Day Year	

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

842899909



# South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.  
2600 Bull Street, Columbia, SC 29201  
Phone: (803) 734-5200  
Emergency & Holidays: (803) 253-6488

PLEASE PRINT or TYPE

(Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No. N J D 0 9 2 2 1 7 8 9 2 0 0 0 2 0	Manifest Document No. 0 9 7 1 5 5 0 1 4	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is by State law.	
3. Generator's Name and Mailing Address REICHHOLD CHEMICALS, INC. 400 DOREMUS AVENUE, NEWARK, NJ 07105				A. State Manifest Document Number		
4. Generator's Phone ( 201 ) 589-3709				B. State Generator's ID SAME		
5. Transporter 1 Company Name VOCON		6. U.S. EPA ID Number PA ID 097155014		C. State Transporter's ID NJ DEP-5-7465		
7. Transporter 2 Company Name		8. U.S. EPA ID Number		D. Transporter's Phone 215-868-5500		
9. Designated Facility Name and Site Address GSX SERVICES OF SOUTH CAROLINA, INC. Rt. 1, BOX 255 PINWOOD, SOUTH CAROLINA 29125		10. U.S. EPA ID Number S C D 9 8 7 5 7 4 6 4 7		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone (803) 452-5003		
11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	
a. NON-HAZARDOUS, NON- REGULATED SOLID WASTE CLEAN UP WASTE SOLIDS (CHEMICALS) CHEMICALS LIST ATTACHED			X 1 X 1 C M	Approx 13,540	P	
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above			K. Handling Codes for Wastes Listed Above			
a. P W - 0 2 2 7 9 - 4 1 0 1			c. - - - - -			
b. - - - - -			d. - - - - -			
15. Special Handling Instructions and Additional Information CHEMICALS LIST ATTACHED. REQUEST CERTIFICATE OF DISPOSAL GSX W.O.# 155976			Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, EPA-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name MIKE BAXI		Signature Mike Baxi		Month Day Year 04/30/92		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name BILL McLAUGHLIN		Signature Bill McLaughlin		Month Day Year 04/30/92		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space ITEM 5, 4, 6 PAD 097155014 VOCON						
a. lbs. c. lbs. b. lbs. d. lbs.						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Signature Month Day Year						

842899910



# South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.  
2600 Bull Street, Columbia, SC 29201  
Phone: (803) 734-5200  
Emergency & Holidays: (803)253-6488

PLEASE PRINT or TYPE

(Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No. N J D 0 9 2 2 1 7 8 9 2 0 0 0 1 9	Manifest Document No. 1	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is by State law.
3. Generator's Name and Mailing Address REICHOLD CHEMICALS, INC. 400 DOREMUS AVENUE, NEWARK, NJ 07105			A. State Manifest Document Number		
4. Generator's Phone ( 201 ) 589-3709			B. State Generator's ID		
5. Transporter 1 Company Name VOCON		6. U.S. EPA ID Number PA00097155014		C. State Transporter's ID NJ DEPS-2465	
7. Transporter 2 Company Name		8. U.S. EPA ID Number		D. Transporter's Phone 215-868-5800	
9. Designated Facility Name and Site Address GSX SERVICES OF SOUTH CAROLINA, INC. Rt. 1, BOX 255 PINWOOD, SOUTH CAROLINA 29125		10. U.S. EPA ID Number S C D 9 8 7 5 7 4 6 4 7		E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone (803) 452-5003	
11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No.	13. Total Quantity	14. Unit Wt/Vol
a. NON-HAZARDOUS, NON-REGULATED SOLID WASTE CLEAN UP WASTE SOLIDS (CHEMICALS) CHEMICALS LIST ATTACHED			X, X, 1	C, M	X, 5, 2, 0, 0 P
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above			K. Handling Codes for Wastes Listed Above		
a. P, W - 0, 2, 2, 7, 9 - 4, 1, 0, 1			c. - - - - -		
b. - - - - -			d. - - - - -		
15. Special Handling Instructions and Additional Information CHEMICALS LIST ATTACHED REQUEST CERTIFICATE OF DISPOSAL GSX W.O. # 155905			Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.		
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name		Signature		Month Day Year	
MIKE BAXI		Mike Baxi		10, 4, 3, 0, 9, 2	
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month Day Year	
Willie Gonzalez		Willie Gonzalez		10, 4, 3, 0, 9, 2	
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
a. lbs. c. lbs. b. lbs. d. lbs.					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Month Day Year	

842899911



# South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.  
2600 Bull Street, Columbia, SC 29201  
Phone: (803) 734-5200  
Emergency & Holidays: (803) 253-6488

PLEASE PRINT or TYPE

(Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No. N J D 0 9 2 2 1 7 8 9 2 0 0 0 1 1 8	Manifest Document No. 0 0 0 1 1 8	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is by State law.	
3. Generator's Name and Mailing Address REICHOLD CHEMICALS, INC. 400 DOREMUS AVENUE, NEWARK, NJ 07105				A. State Manifest Document Number		
4. Generator's Phone ( 201 ) 589-3709				B. State Generator's ID SAME		
5. Transporter 1 Company Name NAPPI TRUCKING CORPORATION		6. U.S. EPA ID Number N J D 10 10 18 11 13 14 17 17		C. State Transporter's ID		
7. Transporter 2 Company Name		8. U.S. EPA ID Number 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		D. Transporter's Phone (908) 566-3000		
9. Designated Facility Name and Site Address GSX SERVICES OF SOUTH CAROLINA, INC. Rt. 1, BOX 255 PINWOOD, SOUTH CAROLINA 29125		10. U.S. EPA ID Number S C D 9 8 7 5 7 4 6 4 7		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone (803) 452-5003		
11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	
a. NON-HAZARDOUS, NON-REGULATED SOLID WASTE CLEAN UP WASTE SOLIDS (CHEMICALS) CHEMICALS LIST ATTACHED.			X, X, 1 C, M	APPROX. X 568.0	P	
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above			K. Handling Codes for Wastes Listed Above			
a. P, W - 0, 2, 2, 7, 9 - 4, 1, 0, 1			c. - - - - -			
b. - - - - -			d. - - - - -			
15. Special Handling Instructions and Additional Information CHEMICALS LIST ATTACHED. REQUEST CERTIFICATE OF DISPOSAL GSX W.O. # 154737			Public reporting burden for this collection of information is estimated to average 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St. SW Washington, D.C. 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name MIKE BAXI		Signature Mike Baxi		Month Day Year 04 29 99		
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name Walter G. Kondracki		Signature W G Kondracki		Month Day Year 04 29 99		
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
a. [ ] lbs. c. [ ] lbs. b. [ ] lbs. d. [ ] lbs.						
20. Facility Owner or Operator, Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Month Day Year		

842899912



# South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.  
2600 Bull Street, Columbia, SC 29201  
Phone: (803) 734-5200  
Emergency & Holidays: (803) 253-6488

PLEASE PRINT or TYPE

(Form designed for use on cliche [12-pitch] typewriter)

Form Approved, OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No. N J D 0 9 2 2 1 7 8 9 2 0 0 0 1 7	Manifest Document No. 0 0 0 1 7	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is by State law.
3. Generator's Name and Mailing Address REICHHOLD CHEMICALS, INC. 400 DOREMUS AVENUE, NEWARK, NJ 07105				A. State Manifest Document Number	
4. Generator's Phone ( 201 ) 589-3709				B. State Generator's ID SAME	
5. Transporter 1 Company Name NAPPI TRUCKING CORPORATION		6. U.S. EPA ID Number N J D 0 0 0 8 1 3 4 7 7		C. State Transporter's ID	
7. Transporter 2 Company Name		8. U.S. EPA ID Number		D. Transporter's Phone (908) 566-3000	
9. Designated Facility Name and Site Address GSX SERVICES OF SOUTH CAROLINA, INC. RT. 1, BOX 255 PINEWOOD, SOUTH CAROLINA 29125		10. U.S. EPA ID Number S C D 9 8 7 5 7 4 6 4 7		E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone (903) 452-5003	
11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type	13. Total Quantity APPROX. 1,062.0
a. NON-HAZARDOUS, NON-REGULATED SOLID WASTE CLEAN UP WASTE SOLIDS (CHEMICALS) CHEMICALS LIST ATTACHED.				X <sub>1</sub> X <sub>1</sub> 1 C <sub>1</sub> M	P
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above	
a. [P] [W] - [0] [2] [2] [7] [9] - [4] [1] [0] [1]				c. [ ] - [ ] - [ ]	
b. [ ] - [ ] - [ ]				d. [ ] - [ ] - [ ]	
15. Special Handling Instructions and Additional Information CHEMICALS LIST ATTACHED. REQUEST CERTIFICATE OF DISPOSAL GSX W.O. # 154736				Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding this burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, EPA-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name MIKE BAXI		Signature Mike Baxi		Month Day Year 04/29/92	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name CARMINE CARUSO		Signature Carmino Caruso		Month Day Year 04/29/92	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
a. [ ] lbs. c. [ ] lbs. b. [ ] lbs. d. [ ] lbs.					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Month Day Year	

842899913



# South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.  
2600 Bull Street, Columbia, SC 29201  
Phone: (803) 734-5200  
Emergency & Holidays: (803) 253-6488

PLEASE PRINT or TYPE

(Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0019 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No. N J D 0 9 2 2 1 7 8 9 2 0 0 0 1 6	Manifest Document No. 6	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is by State law.	
3. Generator's Name and Mailing Address REICHOLD CHEMICALS, INC. 400 DOREMUS AVENUE, NEWARK, NJ 07105				A. State Manifest Document Number		
4. Generator's Phone ( 201 ) 589-3709				B. State Generator's ID SAME		
5. Transporter 1 Company Name NAPPI TRUCKING CORPORATION		6. U.S. EPA ID Number N J D 0 0 0 8 1 3 4 7 7		C. State Transporter's ID		
7. Transporter 2 Company Name		8. U.S. EPA ID Number		D. Transporter's Phone (908) 566-3000		
9. Designated Facility Name and Site Address GSX SERVICES OF SOUTH CAROLINA, INC. Rt. 1, BOX 255 PINWOOD, SOUTH CAROLINA 29125		10. U.S. EPA ID Number S C D 9 8 7 5 7 4 6 4 7		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone (803) 452-5003		
11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	
a. NON-HAZARDOUS, NON-REGULATED SOLID WASTE CLEAN UP WASTE SOLIDS (CHEMICALS) CHEMICALS LIST ATTACHED.			X X 1	APPROX X 598.0	P	
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above			K. Handling Codes for Wastes Listed Above			
a. P W - 0 2 2 7 9 - 4 1 0 1			c. - - - - -			
b. - - - - -			d. - - - - -			
15. Special Handling Instructions and Additional Information CHEMICALS LIST ATTACHED. REQUEST CERTIFICATE OF DISPOSAL GSX W.O. # 154735			Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 31 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W. Washington, D.C. 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name MIKE BAXI		Signature Mike Baxi		Month Day Year 04/29/91		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Tom Scuderi		Signature Tom Scuderi		Month Day Year 04/29/91		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
a. lbs. c. lbs.						
b. lbs. d. lbs.						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Month Day Year		

842899914



# South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.  
2600 Bull Street, Columbia, SC 29201  
Phone: (803) 734-5200  
Emergency & Holidays: (803) 253-6400

PLEASE PRINT or TYPE

(Form designed for use on elite (12-pitch) typewriter)

Form Approved OMB No. 2050-0039 Expires 9-30-91

## UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's U.S. EPA ID No.

N J D 0 9 2 2 1 7 8 9 2 0 0 0 1 5

Manifest  
Document No.

2. Page 1  
of 1

Information in the shaded areas is not  
required by Federal law, but is by State law.

3. Generator's Name and Mailing Address

REICHHOLD CHEMICALS, INC.

400 DOREMUS AVENUE, NEWARK, NJ 07105

4. Generator's Phone (201) 589-3709

5. Transporter 1 Company Name

FREEHOLD CARTAGE INC.

6. U.S. EPA ID Number

N J D 0 5 4 1 2 6 1 6 4

7. Transporter 2 Company Name

8. U.S. EPA ID Number

9. Designated Facility Name and Site Address

GSX SERVICES OF SOUTH CAROLINA, INC.

Rt. 1, BOX 255

PINEWOOD, SOUTH CAROLINA 29125

10. U.S. EPA ID Number

S C D 9 8 7 5 7 4 6 4 7

A. State Manifest Document Number

B. State Generator's ID

SAME

C. State Transporter's ID

D. Transporter's Phone (908) 462-1001

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

(803) 462-5003

11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers  
No. Type

13. Total Quantity

14. Unit  
Wt/Vol

1. Waste Number

a. NON-HAZARDOUS, NON-REGULATED SOLID WASTE.  
CLEAN UP WASTE SOLIDS (CHEMICALS)  
CHEMICALS LIST ATTACHED

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J. Additional Descriptions for Materials Listed Above

a. P W - 0 2 2 7 9 - 4 1 0 1

b. - - - - -

15. Special Handling Instructions and Additional Information

CHEMICALS LIST ATTACHED.

REQUEST CERTIFICATE OF DISPOSAL GSX W.O.# 154734

Public reporting burden for this collection of information is estimated to average 37 minutes for generators, 15 minutes for transporters, and 1 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding this burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

MIKE BAXI

Signature

Mike Baxi

Month Day Year

04/28/91

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Bill Burns

Signature

Bill Burns

Month Day Year

04/28/91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

a. lbs. c. lbs.

b. lbs. d. lbs.

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

842899915





# South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.

2600 Bull Street, Columbia, SC 29201

Phone: (803) 734-5200

Emergency & Holidays: (803) 253-6488

PLEASE PRINT or TYPE

(Form designed for use on elite [12-pitch] typewriter)

Form Approved, OMB No. 2050-0019 Expires 9-30-91

## UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's U.S. EPA ID No.

N J D 0 9 2 2 1 7 8 9 2 0 0 0 1 4

Manifest  
Document No.

2. Page 1  
of 1

Information in the shaded areas is not  
required by Federal law, but is by State law.

3. Generator's Name and Mailing Address

REICHHOLD CHEMICALS, INC.  
400 DOREMUS AVENUE, NEWARK, NJ 07105

A. State Manifest Document Number

B. State Generator's ID

SAME

4. Generator's Phone (201 ) 589-3709

5. Transporter 1 Company Name

FREEHOLD CARTAGE INC.

6. U.S. EPA ID Number

N J D 0 5 4 1 2 6 1 6 1 4

C. State Transporter's ID

D. Transporter's Phone (908) 462-1001

7. Transporter 2 Company Name

8. U.S. EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

GSX SERVICES OF SOUTH CAROLINA, INC.  
Rt. 1, BOX 255

10. U.S. EPA ID Number

PINEWOOD, SOUTH CAROLINA 29125

S C D 9 8 7 5 7 4 6 4 7

G. State Facility's ID

H. Facility's Phone

(803) 452-5003

11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers  
No. Type

13. Total Quantity

14. Unit  
Wt/Vol

15. Waste Number

a. NON-HAZARDOUS, NON-REGULATED SOLID WASTE.  
CLEAN UP WASTE SOLIDS (CHEMICALS)  
CHEMICALS LIST ATTACHED.

X X 1

C M

0 0 0 2 0

Y

2 2 2 2

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

a. P W - 0 2 2 7 9 - 4 1 0 1

c. - - - - -

b. - - - - -

d. - - - - -

15. Special Handling Instructions and Additional Information

CHEMICALS LIST ATTACHED.

REQUEST CERTIFICATE OF DISPOSAL GSX W.O. # 154733

Public reporting burden for this collection of information is estimated  
average: 37 minutes for generators, 15 minutes for transporters, and  
minutes for treatment, storage, and disposal facilities. This includes the  
time for reviewing instructions, gathering data, and completing and reviewing  
the form. Send comments regarding this burden estimate, including  
suggestions for reducing this burden, to Chief, Information Policy  
Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W.,  
Washington, D.C. 20460, and to the Office of Information and Regulatory  
Affairs, Office of Management and Budget, Washington, D.C. 20503.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified,  
packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and  
the laws of the State of South Carolina.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economical  
practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human  
health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method  
that is available to me and that I can afford.

Printed/Typed Name

MIKE BAXI

Signature

Mike Baxi

Month Day Yr

04 27 91

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Bill Burns

Signature

Bill Burns

Month Day Yr

10 14 27 91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Yr

19. Discrepancy Indication Space

a. lbs. c. lbs.

b. lbs. d. lbs.

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Yr

842899916



# South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgmt.  
2600 Bull Street, Columbia, SC 29201  
Phone: (803) 734-5200  
Emergency & Holidays: (803) 253-6488

PLEASE PRINT or TYPE

(Form designed for use on elite (12-pitch) typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No. N J D 0 9 2 2 1 7 8 9 2 0 0 1 3	Manifest Document No. 3	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is by State law.		
3. Generator's Name and Mailing Address REICHOLD CHEMICALS, INC. 400 DOREMUS AVENUE, NEWARK, NJ 07105				A. State Manifest Document Number			
4. Generator's Phone ( 201 ) 589-3709				B. State Generator's ID SAME			
5. Transporter 1 Company Name FREEHOLD CARTAGE INC.		6. U.S. EPA ID Number N J D 0 5 4 1 2 6 1 6 4		C. State Transporter's ID			
7. Transporter 2 Company Name		8. U.S. EPA ID Number		D. Transporter's Phone (908) 462-1001			
9. Designated Facility Name and Site Address GSX SERVICES OF SOUTH CAROLINA Rt. 1, BOX 255 PINWOOD, SOUTH CAROLINA 29125		10. U.S. EPA ID Number S C D 9 8 7 5 7 4 6 4 7		E. State Transporter's ID			
				F. Transporter's Phone			
				G. State Facility's ID			
				H. Facility's Phone (803) 452-5003			
11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
a. NON-HAZARDOUS, NON-REGULATED SOLID WASTE CLEAN UP WASTE SOLIDS (CHEMICALS) CHEMICALS LIST ATTACHED				X 1 X 1 C M	27,080	P	7 7 7 7
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above			
a. P W - 0 2 2 7 9 - 4 1 0 1				c. - - - - -			
b. - - - - -				d. - - - - -			
15. Special Handling Instructions and Additional Information CHEMICALS LIST ATTACHED. REQUEST CERTIFICATE OF DISPOSAL GSX W.O. # 154732				Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name MIKE BAXI		Signature Mike Baxi		Month Day Year 04 28 92			
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name DAVE FLOREN		Signature Dave Floren		Month Day Year 04 28 92	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space		a. lbs. c. lbs.		b. lbs. d. lbs.			
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.		Printed/Typed Name		Signature		Month Day Year	

842899917



# South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.  
2600 Bull Street, Columbia, SC 29201  
Phone: (803) 734-5200  
Emergency & Holidays: (803)253-6488

PLEASE PRINT or TYPE

(Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-91

## UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's U.S. EPA ID No.

N J D 0 9 2 2 1 7 8 9 2 0 0 0 1 2

Manifest  
Document No.

2. Page 1  
of 1

Information in the shaded areas is not  
required by Federal law, but is by State law.

3. Generator's Name and Mailing Address

REICHOLD CHEMICALS, INC.  
400 DOREMUS AVENUE, NEWARK, NJ 07105

4. Generator's Phone ( 201 ) 589-3709

5. Transporter 1 Company Name

FREEHOLD CARTAGE INC.

6. U.S. EPA ID Number

N J D 0 5 4 1 2 6 1 6 4

7. Transporter 2 Company Name

8. U.S. EPA ID Number

1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1

9. Designated Facility Name and Site Address

GSX SERVICES OF SOUTH CAROLINA, INC.  
Rt. 1, BOX 255

PINEWOOD, SOUTH CAROLINA 29125

10. U.S. EPA ID Number

S C D 9 8 7 5 7 4 6 4 7

A. State Manifest Document Number

B. State Generator's ID

SAME

C. State Transporter's ID

D. Transporter's Phone (908) 462-1001

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

(803) 452-5003

11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers  
No. Type

13. Total Quantity

14. Unit  
WT/Vol

I. Waste Number

a. NON-HAZARDOUS, NON-REGULATED SOLID WASTE  
CLEAN UP WASTE SOLIDS (CHEMICALS)  
CHEMICALS LIST ATTACHED.

X, X, 1

C, M

Approx.  
1,654.0

P

7, 7, 7, 7

b.

c.

J. Additional Descriptions for Materials Listed Above

a. P, W - 0, 2, 2, 7, 9 - 4, 1, 0, 1

b. - - - - -

c. - - - - -

d. - - - - -

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

CHEMICALS LIST ATTACHED

REQUEST CERTIFICATE OF DISPOSAL GSX W.O. # 154731

Public reporting burden for this collection of information is estimated to average 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name MIKE BAXI

Signature Mike Baxi

Month Day Year 04 28 92

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name Bill Burns

Signature Bill Burns

Month Day Year 04 28 92

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

J. Discrepancy Indication Space

a. lbs. c. lb

b. lbs. d. lb

20. Facility Owner or Operator; Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

842899918



# South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.  
2600 Bull Street, Columbia, SC 29201  
Phone: (803) 734-5200  
Emergency & Holidays: (803) 253-6488

PLEASE PRINT or TYPE (Form designed for use on elite (12-pitch) typewriter)

Form Approved, OMB No. 2050-0039 Expires 9-30-91

## UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's U.S. EPA ID No.

N J D 0 9 2 2 1 7 8 9 2 0 0 0 1 1

Manifest  
Document No.

2. Page 1  
of 1

Information in the shaded areas is not  
required by Federal law, but is by State law.

3. Generator's Name and Mailing Address

REICHOLD CHEMICALS, INC.

400 DOREMUS AVENUE, NEWARK, NJ 07105

4. Generator's Phone (201 ) 589-3709

A. State Manifest Document Number

B. State Generator's ID

SAME

5. Transporter 1 Company Name

NAPPI TRUCKING CORPORATION

6. U.S. EPA ID Number

N J D 0 0 0 8 1 3 4 7 7

C. State Transporter's ID

D. Transporter's Phone (908) 566-3000

7. Transporter 2 Company Name

8. U.S. EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

GSX SERVICES OF SOUTH CAROLINA, INC.

RT. 1, BOX 255

PINEWOOD, SOUTH CAROLINA 29125

10. U.S. EPA ID Number

S C D 9 8 7 5 7 4 6 4 7

G. State Facility's ID

H. Facility's Phone

(903) 452-5003

11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers  
No. Type

13. Total Quantity

14. Unit  
Wt/Vol

1. Waste Number

a. NON-HAZARDOUS, NON-REGULATED SOLID WASTE  
CLEAN UP WASTE SOLIDS (CHEMICALS)  
CHEMICALS LIST ATTACHED

X, X, 1 C, M

APPROX.  
2124.0

P

7, 7, 7, 7

b.

c.

J. Additional Descriptions for Materials Listed Above

a. P, W - 0, 2, 2, 7, 9 - 4, 1, 0, 1

b. - - - - -

c. - - - - -

d. - - - - -

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

CHEMICALS LIST ATTACHED.

REQUEST CERTIFICATE OF DISPOSAL GSX W.O.# 154576

Public reporting burden for this collection of information is estimated to  
average 37 minutes for generators, 15 minutes for transporters, and 10  
minutes for treatment, storage, and disposal facilities. This includes time  
for reviewing instructions, gathering data, and completing and reviewing  
the form. Send comments regarding this burden estimate, including  
suggestions for reducing this burden, to Chief, Information Policy  
Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W.,  
Washington, D.C. 20460, and to the Office of Information and Regulatory  
Affairs, Office of Management and Budget, Washington, D.C. 20503.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified,  
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the laws of the State of South Carolina.

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practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human  
health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method  
that is available to me and that I can afford.

Printed/Typed Name

MIKE BAXI

Signature

Mike Baxi

Month Day Year

04/23/91

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

John Sneed

Signature

John Sneed

Month Day Year

04/23/91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

Discrepancy Indication Space,

a. 20160 lbs. c. lbs.

b. lbs. d. lbs.

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Wende Elliott

Signature

Wende Elliott

Month Day Year

04/24/91

842899919



# South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.  
2600 Bull Street, Columbia, SC 29201  
Phone: (803) 734-5200  
Emergency & Holidays: (803) 253-6488

PLEASE PRINT or TYPE

(Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-91

## UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's U.S. EPA ID No.

N J D 0 9 2 2 1 7 8 9 2 0 0 0 0 0 0 0

Manifest  
Record No.

2. Page 1  
of 1

Information in the shaded areas is not  
required by Federal law, but is by State law.

3. Generator's Name and Mailing Address

REICHHOLD CHEMICALS, INC.

400 DOREMUS AVENUE, NEWARK, NJ 07105

4. Generator's Phone ( 201 ) 589-3709

A. State Manifest Document Number

B. State Generator's ID  
SAME

5. Transporter 1 Company Name

NAPPI TRUCKING CORPORATION

6. U.S. EPA ID Number

N J D 0 0 0 8 1 1 3 1 4 7 7

C. State Transporter's ID

D. Transporter's Phone (908) 566-3000

7. Transporter 2 Company Name

8. U.S. EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

GSX SERVICES OF SOUTH CAROLINA, INC.  
Rt. 1, BOX 255

10. U.S. EPA ID Number

PINEWOOD, SOUTH CAROLINA 29125 S C D 9 8 7 5 7 4 6 4 7

G. State Facility's ID

H. Facility's Phone

(803) 452-5003

11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers  
No. Type

13. Total Quantity

14. Unit  
Wt/Vol

1. Waste Number

a. NON-HAZARDOUS, NON-REGULATED SOLID WASTE  
CLEAN UP WASTE SOLIDS (CHEMICALS)  
CHEMICALS LIST ATTACHED.

X X 1

C M

APPROX.

0.3760

P

7 7 7 7

b.

c.

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

a. P W - Q 2, 2, 7, 9 - 4 1 0 1

c. - - - - -

b. - - - - -

d. - - - - -

15. Special Handling Instructions and Additional Information

CHEMICALS LIST ATTACHED.

REQUEST CERTIFICATE OF DISPOSAL GSX W.E. # 154575

Public reporting burden for this collection of information is estimated to  
average 37 minutes for generators, 15 minutes for transporters, and 10  
minutes for treatment, storage, and disposal facilities. This includes time  
for reviewing instructions, gathering data, and completing and reviewing  
the form. Send comments regarding this burden estimate, including  
suggestions for reducing this burden, to Chief, Information Policy  
Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W.,  
Washington, D.C. 20460, and to the Office of Information and Regulatory  
Affairs, Office of Management and Budget, Washington, D.C. 20503.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified,  
packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and  
the laws of the State of South Carolina.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically  
practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human  
health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method  
that is available to me and that I can afford.

Printed/Typed Name

MIKE BAXI

Signature

Mike Baxi

Month Day Year

04/23/91

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

JOSEPH SCIAMME

Signature

Joseph Sciamme

Month Day Year

04/23/91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

1. Discrepancy Indication Space

MANIFEST #00110

a. 3100 lbs. c. - - - - -

b. - - - - - lbs. d. - - - - -

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

JOHN SPRINGFIELD

Signature

John Springfield

Month Day Year

04/23/91

842899920

**South Carolina Department of Health  
and Environmental Control**

Bureau of Solid & Hazardous Waste Mgt  
2600 Bull Street, Columbia, SC 29201  
Phone: (803) 734-5200  
Emergency & Holidays: (803)253-6488

PLEASE PRINT or TYPE

(Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's U.S. EPA ID No. <b>N.J.D.0922-17892-22010</b>		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is required by Federal law, but is by State					
3. Generator's Name and Mailing Address <b>REICHHOLD CHEMICALS INC. 400 DOREMUS AVE NEWARK NJ 07105</b>				A. State Manifest Document Number  B. State Generator's ID <b>SAME</b> C. State Transporter's ID D. Transporter's Phone <b>948-566-3000</b> E. State Transporter's ID F. Transporter's Phone G. State Facility's ID H. Facility's Phone <b>803-452-5023</b>									
4. Generator's Phone <b>201-589-3709</b>													
5. Transporter 1 Company Name <b>NAPPI TRUCKING CORP</b>													
6. U.S. EPA ID Number <b>NJ.D.000813477</b>				8. U.S. EPA ID Number  I. Waste Num									
7. Transporter 2 Company Name													
9. Designated Facility Name and Site Address <b>GSC SERVICES OF SOUTH CAROLINA INC. ROUTE 1, BOX 255 PINELAND, SC 29125</b>													
10. U.S. EPA ID Number <b>SC.D.9187574647</b>				12. Containers No. Type <b>EST 001 CM / 19540 P</b>		13. Total Quantity <b>2777</b>							
11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)													
a. <b>NON-HAZARDOUS, NON-REGULATED SOLID WASTE CHEMICALS</b>													
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
a. <b>PW-02279-4101</b>													
b. <b>CERTIFICATE OF DISPOSAL REQUESTED</b> <b>U.O.# 154574 JHN</b>													
15. Special Handling Instructions and Additional Information <b>CHEMICAL LIST ATTACHED</b>													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are cla packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulatio the laws of the State of South Carolina. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be econo practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management that is available to me and that I can afford.													
Printed/Typed Name <b>ROBERT NAUJELIS</b>				Signature <i>Robert Naujelis</i>				Month Day <b>04/23</b>					
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name <b>Fred G. Hammer</b>				Signature <i>Fred G. Hammer</i>				Month Day <b>04/23</b>					
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name				Signature				Month Day					
19. Discrepancy Indication Space													
20. Facility Owner or Operator; Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name <b>Ann Springfield</b> Signature <i>A Springfield</i> Month Day <b>04/23</b>													

842899921



# South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.  
2600 Bull Street, Columbia, SC 29201  
Phone: (803) 734-5200  
Emergency & Holidays: (803)253-6488

PLEASE PRINT or TYPE

(Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-91

## UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's U.S. EPA ID No.

Manifest  
Document No.

2. Page 1  
of 1

Information in the shaded areas is not  
required by Federal law, but is by State law.

3. Generator's Name and Mailing Address

REICHOLD CHEMICALS INC  
400 DOREMUS AVE  
NEWARK NJ 07105

4. Generator's Phone (201) 589 3709

A. State Manifest Document Number

B. State Generator's ID

SAME

5. Transporter 1 Company Name

NAPPI TRUCKING CORP

6. U.S. EPA ID Number

NJ D101008113177

C. State Transporter's ID

D. Transporter's Phone 908-546-3600

7. Transporter 2 Company Name

8. U.S. EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

GSX SERVICES OF SOUTH CAROLINA INC.

RT. 1, Box 255

PINEWOOD, SC 29125

10. U.S. EPA ID Number

SC D19187574647

G. State Facility's ID

H. Facility's Phone

803-452-5003

11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers  
No. Type

13. Total Quantity

14. Unit  
Wt/Vol

1. Waste Number

a. NON-HAZARDOUS, NON-REGULATED  
SOLID WASTE  
CHEMICAL LIST ATTACHED

APPROX  
xx/cm 180.00 P

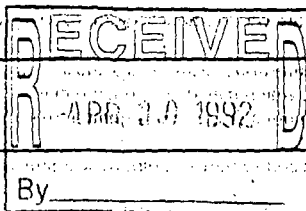
17777

b.

11111

c.

11111



By

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

a. PW-02279-4101

c. 1-1-1

b. 1-1-1

d. 1-1-1

15. Special Handling Instructions and Additional Information

CHEMICAL LIST ATTACHED

CERTIFICATE OF DISPOSAL REQUESTED  
GSX W.D. # 154573

Public reporting burden for this collection of information is estimated to  
average: 37 minutes for generators, 15 minutes for transporters, and 10  
minutes for treatment storage and disposal facilities. This includes time  
for reviewing instructions, gathering data, and completing and reviewing  
the form. Send comments regarding the burden estimate, including  
suggestions for reducing this burden, to Chief, Information Policy  
Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W.,  
Washington, D.C. 20460; and to the Office of Information and Regulatory  
Affairs, Office of Management and Budget, Washington, D.C. 20503.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified,  
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practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human  
health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method  
that is available to me and that I can afford.

Printed/Typed Name

ROBERT NAUJELIS

Signature

Robert Naujelis

Month Day Year

04/23/92

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Tom Scuderi

Signature

Tom Scuderi

Month Day Year

04/23/92

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

a. 19140 lbs. c. 11111 lbs.

b. 11111 lbs. d. 11111 lbs.

20. Facility Owner or Operator; Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

Ann Springfield

Signature

Ann Springfield

Month Day Year

04/24/92

842899922



# South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.  
2600 Bull Street, Columbia, SC 29201  
Phone: (803) 734-5200  
Emergency & Holidays: (803) 253-6488

PLEASE PRINT or TYPE

(Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No. N J D 0 9 2 2 1 7 8 9 2 0 0 0 0 7	Manifest Document No. 0 0 0 0 7	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is by State law.	
Generator's Name and Mailing Address REICHHOLD CHEMICALS, INC. 400 DOREMUS AVENUE, NEWARK, NJ 07105				A. State Manifest Document Number		
Generator's Phone ( 201 ) 589-3709				B. State Generator's ID SAME		
Transporter 1 Company Name FREEHOLD CARTAGE INC.		6. U.S. EPA ID Number N J D 0 5 4 1 2 6 1 6 4		C. State Transporter's ID		
Transporter 2 Company Name		8. U.S. EPA ID Number		D. Transporter's Phone (908) 462-1001		
Designated Facility Name and Site Address GSX SERVICES OF SOUTH CAROLINA, INC. Rt. 1, BOX 255 PINWOOD, SOUTH CAROLINA 29125		10. U.S. EPA ID Number S C D 9 8 7 5 7 4 6 4 7		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone (803) 452-5003		
U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) NON-HAZARDOUS, NON REGULATED SOLID WASTE. CLEAN UP WASTE SOLIDS (CHEMICALS) CHEMICALS LIST ATTACHED				12. Containers No. Type X, X, 1 C, M	13. Total Quantity 3,501.60	14. Unit Wt/Vol P
						I. Waste Number 7 7 7 7 7
Additional Descriptions for Materials Listed Above P W - 0 2 2 7 9 - 4 1 0 1 c. - - - - - d. - - - - -				K. Handling Codes for Wastes Listed Above		
Special Handling Instructions and Additional Information CHEMICALS LIST ATTACHED. REQUEST CERTIFICATE OF DISPOSAL GSX W.O. # 154572				Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PH-223, U.S. Environmental Protection Agency, 401 M St. S.W., Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.		
<b>GENERATOR'S CERTIFICATION:</b> I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name ROBERT NAUTJELIS		Signature <i>Robert Nautjelis</i>		Month Day Year 04 23 92		
Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name AL JOHNSON		Signature <i>al johnson</i>		Month Day Year 04 23 92		
Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year		
J. D. Emergency Indication Space a. 35320 lbs. c. - - - - - lbs. b. - - - - - lbs. d. - - - - - lbs.						
O. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. ~ Printed/Typed Name Ann Springhouse Signature <i>A Springhouse</i> Month Day Year 04 23 92						

842899923





# South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.  
2600 Bull Street, Columbia, SC 29201  
Phone: (803) 734-5200  
Emergency & Holidays: (803)253-6488

PLEASE PRINT or TYPE

(Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No. N J D 0 9 2 2 1 7 8 9 2 0 0 0 0 6	Manifest Document No. 2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is by State law.	
3. Generator's Name and Mailing Address REICHOLD CHEMICALS, INC. 400 DOREMUS AVENUE, NEWARK, NJ 07105			A. State Manifest Document Number		
4. Generator's Phone ( 201 ) 589-3709			B. State Generator's ID SAME		
5. Transporter 1 Company Name FREEHOLD CARTAGE INC.		6. U.S. EPA ID Number N J D 0 5 4 1 1 2 6 1 1 6 4	C. State Transporter's ID		
7. Transporter 2 Company Name		8. U.S. EPA ID Number	D. Transporter's Phone (908) 462-1001		
9. Designated Facility Name and Site Address GSX SERVICES OF SOUTH CAROLINA, INC. Rt. 1, BOX 255 PINWOOD, SOUTH CAROLINA 29125		10. U.S. EPA ID Number S C D 9 8 7 5 7 4 6 4 7	E. State Transporter's ID		
			F. Transporter's Phone		
			G. State Facility's ID		
			H. Facility's Phone (803) 452-5003		
11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
a. NON-HAZARDOUS, NON REGULATED SOLID WASTE CLEAN UP WASTE SOLIDS (CHEMICALS) CHEMICALS LIST ATTACHED.		X, X, 1	C, M	0, 0, 3, 0	Y
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above			
a. P, W - 0, 2, 2, 7, 9 - 4, 1, 0, 1		c. - - - - -			
b. - - - - -		d. - - - - -			
15. Special Handling Instructions and Additional Information  CHEMICALS LIST ATTACHED. REQUEST CERTIFICATE OF DISPOSAL GSX W.O. # 154571		Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, picked, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name MIKE BAXI		Signature Mike Baxi		Month Day Year 04 22 92	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Bill Burns		Signature Bill Burns		Month Day Year 04 22 92	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space  a. lbs. c. lbs. b. lbs. d. lbs.					
20. Facility Owner or Operator; Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Signature Month Day Year					

842899924



# South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.  
2600 Bull Street, Columbia, SC 29201  
Phone: (803) 734-5200  
Emergency & Holidays: (803)253-6488

PLEASE PRINT or TYPE

(Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No. N J D 0 9 2 2 1 7 8 9 2 0 0 0 0 5	Manifest Document No. 2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is by State law.	
3. Generator's Name and Mailing Address REICHOLD CHEMICALS, INC. 400 DOREMUS AVENUE, NEWARK, NJ 07105		A. State Manifest Document Number			
4. Generator's Phone ( 201 ) 589-3709		B. State Generator's ID SAME			
5. Transporter 1 Company Name FREEHOLD CARTAGE INC.		6. U.S. EPA ID Number N J D 0 5 4 1 1 2 6 1 1 6 4		C. State Transporter's ID	
7. Transporter 2 Company Name		8. U.S. EPA ID Number 		D. Transporter's Phone (908) 462-1001	
9. Designated Facility Name and Site Address GSX SERVICES OF SOUTH CAROLINA, INC. Rt. 1, BOX 255 PINWOOD, SOUTH CAROLINA 29125		10. U.S. EPA ID Number S C D 9 8 7 5 7 4 6 4 7		E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone (803) 452-5003	
11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. NON-HAZARDOUS, NON REGULATED SOLID WASTE. CLEAN UP WASTE SOLIDS (CHEMICALS) CHEMICALS LIST ATTACHED		X 1 X 1	C M	X 1 X 1 X 3 0	Y
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above			
a. P W - [ 0 2 2 7 9 ] - [ 4 1 0 1 ]		c. [ ] - [ ] - [ ]			
b. [ ] - [ ] - [ ]		d. [ ] - [ ] - [ ]			
15. Special Handling Instructions and Additional Information CHEMICALS LIST ATTACHED. REQUEST CERTIFICATE OF DISPOSAL GSX W.O. # 154570		Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name MIKE BAXI		Signature Mike Baxi		Month Day Year 04 22 92	
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name AL JOHNSON		Signature al johnson		Month Day Year 04 22 92	
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
a [ ] lbs. c [ ] lbs. b [ ] lbs. d [ ] lbs.					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Month Day Year	

842899925



# South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.  
2600 Bull Street, Columbia, SC 29201  
Phone: (803) 734-5200  
Emergency & Holidays: (803)253-6488

PLEASE PRINT or TYPE

(Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No. N J D 0 9 2 2 1 7 8 9 2 0 0 0 0 4	Manifest Document No. 0 0 0 0 4	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is by State law.		
3. Generator's Name and Mailing Address REICHHOLD CHEMICALS, INC. 400 DOREMUS AVENUE, NEWARK, NJ 07105				A. State Manifest Document Number SAME			
4. Generator's Phone (201 ) 589-3709				B. State Generator's ID			
5. Transporter 1 Company Name FREEHOLD CARTAGE, INC.		6. U.S. EPA ID Number N J D 0 5 4 1 2 6 1 6 4		C. State Transporter's ID			
7. Transporter 2 Company Name		8. U.S. EPA ID Number		D. Transporter's Phone (908) 462-1001			
9. Designated Facility Name and Site Address GSX SERVICES OF SOUTH CAROLINA, INC. RT. 1 BOX 255 PINWOOD, SOUTH CAROLINA 29125		10. U.S. EPA ID Number S C D 9 8 7 5 7 4 6 4 7		E. State Transporter's ID			
				F. Transporter's Phone			
				G. State Facility's ID			
				H. Facility's Phone (803) 452-5003			
11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	15. Waste Number
a. NON HAZARDOUS, NON REGULATED [CLEAN UP WASTE SOLIDS (CHEMICALS)] SOLID WASTE. CHEMICALS LIST ATTACHED.				X, X, 1 C, M	1,878.0	P	7 7 7 7
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above			
a. P W - 0 2 2 7 9 - 4 1 0 1				c. - - - - -			
b. - - - - -				d. - - - - -			
15. Special Handling Instructions and Additional Information CHEMICALS LIST ATTACHED.  REQUEST CERTIFICATE OF DISPOSAL GSX W.O.# 153083				Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PH-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name MIKE BAXI				Signature Mike Baxi.		Month Day Year 0 4 1 5 9 2	
17. Transporter 1 Acknowledgement of Receipt of Materials				Month Day Year			
Printed/Typed Name Timothy M. McIntyre				Signature [Signature]		Month Day Year 0 4 1 5 9 2	
18. Transporter 2 Acknowledgement of Receipt of Materials				Month Day Year			
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space				a. 17900 lbs. c. lbs. b. lbs. d. lbs.			
Send Instruction sheet with Manifest							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name Ann Springfield				Signature [Signature]		Month Day Year	

842899926



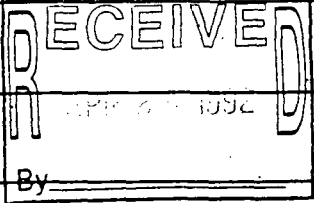
# South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.  
2600 Bull Street, Columbia, SC 29201  
Phone: (803) 734-5200  
Emergency & Holidays: (803)253-6488

PLEASE PRINT or TYPE

(Form designed for use on elite [12-pitch] typewriter)

Form Approved, OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No. N J D 0 9 2 2 1 7 8 9 2 0 0 0 0 3	Manifest Document No. 2 0 0 0 0 3	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is by State law.	
3. Generator's Name and Mailing Address REICHOLD CHEMICALS, INC. 400 DOREMUS AVENUE, NEWARK, NJ 07105				A. State Manifest Document Number		
4. Generator's Phone (201) 589-3709				B. State Generator's ID SAME		
5. Transporter 1 Company Name FREEHOLD CARTAGE INC.		6. U.S. EPA ID Number N J D 0 S H 1 2 5 1 6 4		C. State Transporter's ID		
7. Transporter 2 Company Name		8. U.S. EPA ID Number		D. Transporter's Phone (908) 462-1001		
9. Designated Facility Name and Site Address GSX SERVICES OF SOUTH CAROLINA, INC. Rt. 1, BOX 255 PINWOOD, SOUTH CAROLINA 29125		10. U.S. EPA ID Number S C D 9 8 7 5 7 4 6 4 7		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone (803) 452-5003		
11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	
a. <del>NON-HAZARDOUS, NON-REGULATED</del> CLEAN UP WASTE SOLIDS (CHEMICALS) SOLID WASTE. CHEMICALS LIST ATTACHED.			X, X, 1	C, M	3, 2, 2, 6, 7	
b. 					P	
c.						
d.						
J. Additional Descriptions for Materials Listed Above			K. Handling Codes for Wastes Listed Above			
a. P W - 0 2 2 7 9 - 4 1 0 1			c. - - - - -			
b. - - - - -			d. - - - - -			
15. Special Handling Instructions and Additional Information CHEMICALS LIST ATTACHED. REQUEST CERTIFICATE OF DISPOSAL GSX W.O.# 153082			Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name MIKE BAXI		Signature Mike Baxi		Month Day Year 04/15/92		
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name Michael T. East SR.		Signature Michael T. East Sr.		Month Day Year 04/15/92		
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
a. 31560 lbs. c. - - - - - lbs. b. - - - - - lbs. d. - - - - - lbs.						
20. Facility Owner or Operator; Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.						
Printed/Typed Name Ann Springfield		Signature Ann Springfield		Month Day Year 04/15/92		

842899927



STATE OF ARKANSAS  
Department of Pollution Control and Ecology  
P. O. Box 8913 Little Rock, Arkansas 72219-8913  
Telephone 501-562-7444

1

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <b>NJD092217892</b>		Manifest Document No.		2. Page 1 of		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address <b>Reichhold Chemicals, Inc.</b> <b>400 Doremus Avenue</b> <b>Newark, NJ 07105</b> 4. Generator's Phone ( <b>(201) 589-3709</b>				Attn: <b>Bob Naujels</b>		A. State Manifest Document Number <b>AR- 552566</b> <b>2</b> B. State Generator's ID					
5. Transporter 1 Company Name <b>NAPPI TRUCKING CORP</b>		6. US EPA ID Number <b>NJD0000813477</b>		C. State Transporter's ID <b>PC 1009 H 319</b>		D. Transporter's Phone <b>908-566-3000</b>					
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID <b>PC - - - - H - - -</b>		F. Transporter's Phone					
Designated Facility Name and Site Address <b>Rineco</b> <b>1007 Vulcan Rd. - Haskell</b> <b>Benton, AR. 72015</b>		10. US EPA ID Number <b>ARD981057870</b>		G. State Facility's ID		H. Facility's Phone <b>501778-9089</b>					
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. <b>Hazardous Waste Solid, N.O.S.</b> <b>ORM-E NA9189</b>				<b>XX1 CMX</b>		<b>5000</b>		<b>P</b>		<b>U041, U147, U190</b>	
b.											
c.											
d.											
J. Additional Hazardous Waste Materials Listed Above <b>a. 9205-1435 ERO #31</b>				K. Handling Codes for Wastes Listed Above EMERGENCY RESPONSE INFORMATION: <b>Bob Naujels</b> <b>201-589-3709</b>							
if no alternate TSDF, return to generator											
15. Special Handling Instructions and Additional Information <b>DECAL # 14745 / NJ DEPS-10342</b>											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.											
Printed/Typed Name <b>MIKE BAXI</b>		Signature <i>Mike Baxi</i>		Month <b>05</b>		Day <b>04</b>		Year <b>92</b>			
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>John SNEED</b>		Signature <i>John Sneed</i>		Month <b>10</b>		Day <b>14</b>		Year <b>1992</b>			
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month		Day		Year			
19. Discrepancy Indication Space											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name				Signature		Month		Day		Year	

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

842899928



STATE OF ARKANSAS  
Department of Pollution Control and Ecology  
P. O. Box 8913 Little Rock, Arkansas 72219-8913  
Telephone 501-562-7444

6

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address ATM. Rob Naujels 100 DOWNS AVENUE NEWARK, NJ 07105 (201) 589-3709		4. Generator's Phone ( )		A. State Manifest Document Number AR- 551883	
5. Transporter 1 Company Name AMERICAN INDUSTRIAL MACHINE INC		6. US EPA ID Number NJ D981873664		C. State Transporter's ID 1278-535	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 708 756-1200	
9. Designated Facility Name and Site Address Holt Park Rd - Washell Bogart AR 72015		10. US EPA ID Number ARD981057870		E. State Transporter's ID PC --- H --- F. Transporter's Phone G. State Facility's ID H. Facility's Phone 501-778-9089	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol
a. HAZARDOUS WASTE, FLAMMABLE CORROSIVE HA9189		No. Type 001 DM		00007	T (R41, U147, U150)
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above DECAL # 14208		K. Handling Codes for Wastes Listed Above EMERGENCY RESPONSE INFORMATION: 201-589-3709			
if no alternate TSDF, return to generator					
15. Special Handling Instructions and Additional Information Waste being shipped by the generator to another TSDF facility. The transporter or receiver facility shall retain the manifest according to the generator's instructions. Keep a copy of the generator's manifest at the designated facility, and retain a copy of the manifest to return to the generator. (Note: This is required for all.)					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name ROBERT NAUJELIS		Signature Robert Naujels		Month Day Year 05 01 92	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name T. J. King		Signature T. J. King		Month Day Year 05 01 92	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space SP/1/2					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Signature Month Day Year					

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

GENERATOR INITIAL COPY

842899929

State of New Jersey  
Department of Environmental Protection  
Division of Hazardous Waste Management  
Manifest Section  
CN 028, Trenton, NJ 08625

23706

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039, Expires 9-

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. NJ1092217892010101		Manifest Document No.		2. Page 1 of 1		Information in the shaded area is not required by Federal law.					
3. Generator's Name and Mailing Address REICHOIL CHEMICALS, INC. 400 JORDANUS AVENUE, NEWARK, NJ 07105						A. State Manifest Document Number <b>NJA 1161682</b>							
4. Generator's Phone (201) 589-3709						B. State Generator's ID SAME							
5. Transporter 1 Company Name GLOVER CORP.						6. US EPA ID Number VA0040159436							
7. Transporter 2 Company Name						8. US EPA ID Number							
9. Designated Facility Name and Site Address GLOVER CORP. ROUTE 1, Box 101 Cascadia, Va. 24069						10. US EPA ID Number VA0077942266							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) FLAMMABLE LIQUID, N.O.S. UN-1993						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
						XX 1 CN		XX 3200				D0101	
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
a. ACRYLIC ACID - 0-18% STYRENE 0-20% HYDROXYL ACRYLATE 0-10% TRIMETHYL AMINE 0-3% METHYL ACRYLATE 0-60%						S-02 T-18 LIGHTWEIGHT AGGREGATE ROTARY KILN							
16. Special Handling Instructions and Additional Information GUIDE #27 CERTIFICATE OF DISPOSAL REQUIRED - LDR attached 18535						EMERGENCY CONTACT: Bob Naujels (201) 589-3709 CHENTREC 1-800-424-9300							
17. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.													
18. I am a large quantity generator. I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name MIKE BAXI						Signature Mike Baxi				Month Day Year 04/14/91			
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature James Broughton				Month Day Year 04/14/91			
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature				Month Day Year			
19. Discrepancy Indication Space Item 14 changed to yellow - ITEM 11a SHOULD READ: WASTE FLAMMABLE LIQUID, N.O.S. FLAMMABLE LIQUID, UN 1993 METHYL ACRYLATE													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name BETTY TALLEY						Signature Betty Talley				Month Day Year 04/14/91			

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)

12/1/89, 2/10/92 (Rev. 3/89) Previous editions are obsolete.

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

3 - TSD MAIL TO - GENERATOR

842899930



STATE OF ARKANSAS  
Department of Pollution Control and Ecology  
P. O. Box 8913 Little Rock, Arkansas 72219-8913  
Telephone 501-562-7444

1

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <b>NJD092217892</b>		Manifest Document No. <b>010115</b>		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address <b>Reichhold Chemicals, Inc.</b> <b>400 Doremus Avenue Newark, NJ 07105</b>						A. State Manifest Document Number <b>AR- 551881</b>							
4. Generator's Phone (201) 589-3709						B. State Generator's ID							
5. Transporter 1 Company Name <b>NAPPITRYCKING CORP.</b>						C. State Transporter's ID <b>PC 1009 H 319</b>							
6. US EPA ID Number <b>NJD0100813477</b>						D. Transporter's Phone <b>908-566-3000</b>							
7. Transporter 2 Company Name <b>NAPPITRYCKING</b>						E. State Transporter's ID <b>PC H</b>							
8. US EPA ID Number						F. Transporter's Phone							
9. Designated Facility Name and Site Address <b>Rineco</b> <b>1007 Vulcan Rd. - Haskell Benton, AR. 72015</b>						G. State Facility's ID							
10. US EPA ID Number <b>ARD981057870</b>						H. Facility's Phone <b>501778-9089</b>							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. <b>Hazardous Waste Solid, N.O.S. ORM-E NA9189</b>						No. <b>XXI</b> Type <b>CM</b>		<b>00007</b>		<b>T</b>		<b>U041, U147, U190</b>	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above <b>a. 9203-1433 ERG #31</b> <b>TRI SODIUM PHOSPHATE, MALEIC ANHYDRIDE,</b> <b>RESINS, PHTHALIC ANHYDRIDE, XENAXINE</b>						K. Handling Codes for Wastes Listed Above EMERGENCY RESPONSE INFORMATION: <b>Bob Nappels</b> <b>201-589-3709</b>							
if no alternate TSDF, return to generator													
15. Special Handling Instructions and Additional Information If the designated facility does not accept the entire shipment, transporter or TSD facility shall notify the generator by telephone of the amount of waste being returned to the generator or alternate TSD facility. The transporter or receiving facility shall revise the manifest according to the generator's instructions, leave a copy of the generator's manifest at the designated facility, and retain a copy of the manifest to deliver to the generator along with the rejected waste. <b>Decal # 14776 NJ DEP 510342</b>													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name <b>MIKE BAXI</b>						Signature <b>Mike Baxi</b>						Month Day Year <b>04/10/92</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name <b>Russell E NALBONE</b>						Signature <b>Russell E. Nalbhone</b>						Month Day Year <b>04/10/92</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature						Month Day Year	
19. Discrepancy Indication Space <b>CHANGED #12 to 14</b> <b>Mike Baxi</b>													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name <b>RAYMOND L. REAGAN</b>						Signature <b>Raymond L. Reagan</b>						Month Day Year <b>04/14/92</b>	

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

842899931





STATE OF ARKANSAS  
Department of Pollution Control and Ecology  
P. O. Box 8913 Little Rock, Arkansas 72219-8913  
Telephone 501-562-7444

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Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address <b>Reichhold Chemicals, Inc.</b> <b>400 Doremus Avenue</b> <b>(201) 589-3709</b>		Attn: Bob Namjels <b>Newark, NJ 07105</b>		A. State Manifest Document Number <b>AR- 551878</b>		
4. Generator's Phone (		5. Transporter 1 Company Name <b>AMERICAN INDUSTRIAL MARINE INC</b>		C. State Transporter's ID <b>PC 1278 H 535</b>		
6. US EPA ID Number		7. Transporter 2 Company Name		D. Transporter's Phone <b>908-756-4200</b>		
8. US EPA ID Number		9. Designated Facility Name and Site Address <b>Rineco</b> <b>1007 Vulcan Rd. - Haskell</b> <b>Benton, AR. 72015</b>		E. State Transporter's ID <b>PC H</b>		
10. US EPA ID Number		G. State Facility's ID		H. Facility's Phone <b>501/778-9089</b>		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity		14. Unit Wt/Vol
a. <b>Hazardous Waste Solid, N.O.S.</b> <b>ORM-E NA9189</b>		No. Type <b>XXI CM</b>		<b>0101018</b>		<b>T</b>
b.						<b>U041, U147, U190</b>
c.						
d.						
J. Additional Descriptions for Materials Listed Above <b>9203-1433 ERG #31</b> <b>PHTHALIC ANHYDRIDE</b> <b>MALIC ANHYDRIDE</b> <b>HEXAMINE.</b>		K. Handling Codes for Wastes Listed Above <b>EMERGENCY RESPONSE INFORMATION:</b> <b>Bob Namjels</b> <b>201-589-3709</b>				
if no alternate TSDF, return to generator						
15. Special Handling Instructions and Additional Information If the designated facility does not accept the entire shipment, transporter or TSD facility shall notify the generator by telephone of the amount of waste being returned to the generator or alternate TSD facility. The transporter or receiving facility shall revise the manifest according to the generator's instructions, leave a copy of the generator's manifest at the designated facility, and retain a copy of the manifest to deliver to the generator along with the rejected waste.						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name <b>MIKE BAXI</b>		Signature <b>Mike Baxi</b>		Month Day Year <b>04.09.92</b>		
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name <b>GARRY W. GARNY (Agent for Aims)</b>		Signature <b>Garry W. Garny</b>		Month Day Year <b>04.09.92</b>		
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space <b>CHANGED ITEM 12 &amp; 14.</b> <b>M. Baxi.</b>						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name <b>Richard A. Still</b>		Signature <b>Richard A. Still</b>		Month Day Year <b>04.10.92</b>		

PA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

842899932



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Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No. <b>NJD092217892</b>		Manifest Document No. <b>000008</b>		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address <b>Reichhold Chemicals, Inc.</b> <b>400 Doremus Avenue</b> <b>Newark, NJ 07105</b>				4. Generator's Phone <b>(201) 589-3709</b>		A. State Manifest Document Number <b>AR- 551877</b>							
5. Transporter 1 Company Name <b>AMERICAN INDUSTRIAL MARINE INC</b>				6. US EPA ID Number <b>NJD09811873664</b>		C. State Transporter's ID <b>PC 1278 H535</b>							
7. Transporter 2 Company Name <b>VoCon</b>				8. US EPA ID Number <b>PIAD1091715510114</b>		D. Transporter's Phone <b>908-756-4200</b>							
9. Designated Facility Name and Site Address <b>Rinco</b> <b>1007 Vulcan Rd. - Haskell</b> <b>Benton, AR. 72015</b>				10. US EPA ID Number <b>ARD981057870</b>		E. State Transporter's ID <b>PC 1132-583</b>							
						F. Transporter's Phone <b>215-868-5800</b>							
						G. State Facility's ID							
						H. Facility's Phone <b>501-778-9089</b>							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. <b>Hazardous Waste Solid, N.O.S.</b> <b>ORM-E NA9189</b>						No. <b>001</b> Type <b>CM</b>		<b>0.0008</b>		<b>T</b>		<b>U041, U147, U190</b>	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above <b>A. 9203-1433 ERG 431</b> <b>PHTHALIC ANHYDRIDE</b> <b>MALEIC ANHYDRIDE</b> <b>HEXAMINE</b>						K. Handling Codes for Wastes Listed Above <b>EMERGENCY RESPONSE INFORMATION:</b> <b>Bob Namjels</b> <b>201-589-3709</b>							
if no alternate TSDF, return to generator													
15. Special Handling Instructions and Additional Information If the designated facility does not accept the entire shipment, transporter or TSD facility shall notify the generator by telephone of the amount of waste being returned to the generator or alternate TSD facility. The transporter or receiving facility shall revise the manifest according to the generator's instructions, leave a copy of the generator's manifest at the designated facility, and retain a copy of the manifest to deliver to the generator along with the rejected waste.													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name <b>ROBERT NAUJELIS</b>						Signature <i>[Signature]</i>			Month Day Year <b>04.07.92</b>				
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>BENNY COCCIA</b>						Signature <i>[Signature]</i>			Month Day Year <b>04.07.92</b>				
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name <b>Glenn W Frank</b>						Signature <i>[Signature]</i>			Month Day Year <b>04.08.92</b>				
19. Discrepancy Indication Space <b>CHANGED C TO E R. Nay</b> <b>CHANGED 12 AND 14</b>													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name <b>Sean Green</b>						Signature <i>[Signature]</i>			Month Day Year <b>04.10.92</b>				

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR

842899933



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Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <b>NJD092217892</b>		Manifest Document No. <b>000007</b>		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address <b>Reichhold Chemicals, Inc.</b> <b>400 Doremus Avenue</b> <b>Newark, NJ 07105</b>						A. State Manifest Document Number <b>AR- 551875</b>							
4. Generator's Phone ( <b>(201) 589-3709</b> )						B. State Generator's ID							
5. Transporter 1 Company Name <b>NAPPI TRUCKING CORP.</b>						C. State Transporter's ID <b>PC 1889 H 319</b>							
6. US EPA ID Number <b>NJD000813477</b>						D. Transporter's Phone <b>908-566-3000</b>							
7. Transporter 2 Company Name <b>NAPPI Trucking Corp</b>						E. State Transporter's ID <b>PC 1009 H 319</b>							
8. US EPA ID Number <b>NJD000813477</b>						F. Transporter's Phone <b>908-566-3000</b>							
9. Designated Facility Name and Site Address <b>Rineco</b> <b>1007 Vulcan Rd. - Haskell</b> <b>Benton, AR. 72015</b>						G. State Facility's ID							
10. US EPA ID Number <b>ARD981057870</b>						H. Facility's Phone <b>501778-9089</b>							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. <b>Hazardous Waste Solid, N.O.S.</b> <b>ORM-E NA9189</b>						No. <b>1</b> Type <b>C</b>		<b>XXIX</b>		<b>XXIX</b>		<b>U041, U147, U190</b>	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above <b>a. 9203-1433 ERO #31</b>						K. Handling Codes for Wastes Listed Above <b>EMERGENCY RESPONSE INFORMATION:</b> <b>Bob Naujels</b> <b>201-589-3709</b>							
if no alternate TSDF, return to generator													
15. Special Handling Instructions and Additional Information <b>If the designated facility does not accept the entire shipment, transporter or TSD facility shall notify the generator by telephone of the amount of waste being returned to the generator or alternate TSD facility. The transporter or receiving facility shall revise the manifest according to the generator's instructions, leave a copy of the generator's manifest at the designated facility, and retain a copy of the manifest to deliver to the generator along with the rejected waste.</b> <b>DECAL # 14724 NJDEP S-10342</b>													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name <b>MIKE BAXI</b>						Signature <b>Mike Baxi</b>		Month Day Year <b>04.03.92</b>					
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name <b>CARMINE CARUSO</b>						Signature <b>Carmine Caruso</b>		Month Day Year <b>04.03.92</b>					
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name <b>Tom Sunderi</b>						Signature <b>Tom Sunderi</b>		Month Day Year <b>07.05.92</b>					
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name <b>Michael Hudson</b>						Signature <b>Michael Hudson</b>		Month Day Year <b>04.07.92</b>					

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

842899934



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Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <b>NJD092217892</b>	Manifest Document No. <b>00008</b>	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>Reichhold Chemicals, Inc.</b> <b>400 Doremus Avenue</b> <b>Newark, NJ 07105</b>			A. State Manifest Document Number <b>AR-551876</b>		2
4. Generator's Phone (201) 589-3709			B. State Generator's ID		
5. Transporter 1 Company Name <b>NAPPI TRUCKING CORP</b>			6. US EPA ID Number <b>NJD101008113477</b>		
7. Transporter 2 Company Name <b>NAPPI TRUCKING CORP.</b>			8. US EPA ID Number <b>NJD101008113477</b>		
9. Designated Facility Name and Site Address <b>Rineco</b> <b>1007 Vulcan Rd. - Haskell</b> <b>Benton, AR. 72015</b>			10. US EPA ID Number <b>ARD981057870</b>		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) <b>a. Hazardous Waste Solid, N.O.S.</b> <b>ORM-E NA9189</b>			12. Containers No. Type <b>XXI CM</b>	13. Total Quantity <b>55T</b>	14. Unit Wt/Vol <b>U041, U147, U190</b>
J. Additional Descriptions for Materials Listed Above <b>a. 9203-1433 ERG #31</b>			K. Handling Codes for Wastes Listed Above <b>EMERGENCY RESPONSE INFORMATION:</b> <b>Bob Naujels</b> <b>201-589-3709</b>		
if no alternate TSDF, return to generator					
15. Special Handling Instructions and Additional Information If the designated facility does not accept the entire shipment, transporter or TSD facility shall notify the generator by telephone of the amount of waste being returned to the generator or alternate TSD facility. The transporter or receiving facility shall revise the manifest according to the generator's instructions, leave a copy of the generator's manifest at the designated facility, and retain a copy of the manifest to deliver to the generator along with the rejected waste. <b>DECAL # 14714 NJDEPS-10342</b>					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name <b>MIKE BAXI</b>			Signature <b>Mike Baxi</b>		Month Day Year <b>04/03/92</b>
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>CARMINE CARUSO</b>			Signature <b>Carmine Caruso</b>		Month Day Year <b>04/03/92</b>
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name <b>Walter G. Kondracki</b>			Signature <b>W.G. Kondracki</b>		Month Day Year <b>04/05/92</b>
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name <b>Michael Hudson</b>			Signature <b>Michael Hudson</b>		Month Day Year <b>04/07/92</b>

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

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Form Approved. OMB No. 2050-0039. Expires 9-30-9

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No. <b>NJD092217892</b>		Manifest Document No. <b>01001016</b>		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address <b>Reichhold Chemicals, Inc.</b> <b>400 Doremus Avenue</b> <b>Newark, NJ 07105</b>				4. Generator's Phone <b>(201) 589-3709</b>		A. State Manifest Document Number <b>AR- 551874</b>							
5. Transporter 1 Company Name <b>NAPPI TRUCKING CORP</b>				6. Transporter 1 US EPA ID Number <b>NJD01008113477</b>		C. State Transporter's ID <b>PC 1009 H 319</b>							
7. Transporter 2 Company Name <b>NAPPI TRUCKING CORP</b>				8. Transporter 2 US EPA ID Number <b>NJD01008113477</b>		D. Transporter's Phone <b>908-566-300</b>							
9. Designated Facility Name and Site Address <b>Rinco</b> <b>1007 Vulcan Rd. - Haskell</b> <b>Benton, AR. 72015</b>				10. Facility's US EPA ID Number <b>ARD981057870</b>		E. State Transporter's ID <b>PC 1009 H 319</b>							
						F. Transporter's Phone <b>908-566-300</b>							
						G. State Facility's ID							
						H. Facility's Phone <b>501/778-9089</b>							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. <b>Hazardous Waste Solid, N.O.S.</b> <b>ORM-E NA9189</b> <b>(ADIPIIC ACID)</b>						No. <b>X</b> Type <b>1</b>		<b>707</b>				<b>U041, U147, U19</b>	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above <b>a. 9203-1433 ERG #31</b>						K. Handling Codes for Wastes Listed Above <b>EMERGENCY RESPONSE INFORMATION:</b> <b>Bob Naujels</b> <b>201-589-3709</b>							
if no alternate TSDF, return to generator													
15. Special Handling Instructions and Additional Information <b>If the designated facility does not accept the entire shipment, transporter or TSD facility shall notify the generator by telephone of the amount of waste being returned to the generator or alternate TSD facility. The transporter or receiving facility shall revise the manifest according to the generator's instructions, leave a copy of the generator's manifest at the designated facility, and retain a copy of the manifest to deliver to the generator along with the rejected waste.</b> <b>DECAL # 20709 NJDCP-5-10342</b>													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name <b>MIKE BAXI</b>						Signature <b>Mike Baxi</b>						Month Day Year <b>04.03.92</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>CARMINE CASULO</b>						Signature <b>Carmine Casulo</b>						Month Day Year <b>04.03.92</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name <b>JOSEPH SCIAFFE</b>						Signature <b>Joseph Sciaffe</b>						Month Day Year <b>04.05.92</b>	
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name <b>Michael Hudson</b>						Signature <b>Michael Hudson</b>						Month Day Year <b>04.07.92</b>	

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

842899936



Form Approved. OMB No. 2050-0039. Expires 9-30-92

AR-11-91

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Form Approved: OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <b>NJD092217892</b>	Manifest Document No. <b>000015</b>	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>Reichhold Chemicals, Inc.</b> <b>400 Doramus Avenue</b> <b>Newark, NJ 07105</b>			A. State Manifest Document Number <b>AR- 546065</b>		2
4. Generator's Phone (201) 589-3709			B. State Generator's ID		
5. Transporter 1 Company Name <b>NAPPI TRUCKING CORP</b>			6. US EPA ID Number <b>NJD0000813477</b>	C. State Transporter's ID <b>PC 1009 H 319</b>	D. Transporter's Phone <b>908-566-3000</b>
7. Transporter 2 Company Name			8. US EPA ID Number	E. State Transporter's ID <b>PC - - - - H - - -</b>	F. Transporter's Phone
9. Designated Facility Name and Site Address <b>Rineco</b> <b>1007 Vulcan Rd. - Haskell</b> <b>Benton, AR. 72015</b>			10. US EPA ID Number <b>ARD981057870</b>	G. State Facility's ID	
			H. Facility's Phone <b>501/778-9089</b>		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol
a. <b>Hazardous Waste Solid, N.O.S.</b> <b>ORM-E NA9189</b>			<b>X</b> <b>X</b> <b>1</b> <b>CM</b>	<b>X</b> <b>X</b> <b>X</b> <b>X</b> <b>9</b> <b>T</b>	<b>U041, U147, U190</b>
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above <b>a. 9112-5331 ERG #31</b>			K. Handling Codes for Wastes Listed Above <b>EMERGENCY RESPONSE INFORMATION:</b> <b>Bob Nappellis</b> <b>201-589-3709</b>		
If no alternate TSDF, return to generator.					
15. Special Handling Instructions and Additional Information <b>If the designated facility does not accept the entire shipment, transporter or TSD facility shall notify the generator by telephone of the amount of waste being returned to the generator or alternate TSD facility. The transporter or receiving facility shall revise the manifest according to the generator's instructions, leave a copy of the generator's manifest at the designated facility, and retain a copy of the manifest to deliver to the generator along with the rejected waste.</b> <b>DECAL # 14737 NSDEPS-10342</b>					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name <b>MIKE BAXI</b>			Signature <b>Mike Baxi</b>		Month Day Year <b>03/27/92</b>
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>John SNEED</b>			Signature <b>John Sneed</b>		Month Day Year <b>03/27/92</b>
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name			Signature		Month Day Year
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name <b>Michael Hudson</b>			Signature <b>Michael Hudson</b>		Month Day Year <b>03/31/92</b>

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

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STATE OF ARKANSAS  
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Telephone 501-562-7444

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Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <b>NJD092217892</b>	Manifest Document No. <b>00004</b>	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>Reichhold Chemicals, Inc.</b> <b>400 Doremus Avenue</b> <b>Newark, NJ 07105</b>			A. State Manifest Document Number <b>AR-546066</b>		2
4. Generator's Phone <b>(201) 589-3709</b>			B. State Generator's ID		
5. Transporter 1 Company Name <b>NAPPI TRUCKING CORP</b>			6. US EPA ID Number <b>MJD0100813477</b>	C. State Transporter's ID <b>PC 1009 H 319</b>	
7. Transporter 2 Company Name <b>NAPPI Trucking Corp</b>			8. US EPA ID Number <b>MSD0000813477</b>	D. Transporter's Phone <b>908-566-3000</b>	
9. Designated Facility Name and Site Address <b>Rineco</b> <b>1007 Vulcan Rd. - Haskell</b> <b>Benton, AR. 72015</b>			10. US EPA ID Number <b>ARD981057870</b>	E. State Transporter's ID <b>PC 1009 H 319</b>	
			F. Transporter's Phone <b>908-566-3000</b>		G. State Facility's ID
			H. Facility's Phone <b>501-778-9089</b>		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers	13. Total Quantity	14. Unit Wt/Vol
a. <b>Hazardous Waste Solid, N.O.S.</b> <b>ORM-E NA9189</b>			No. <b>XXI CM</b>	Type <b>XXIXX 15T</b>	Waste No. <b>U041, U147, U190</b>
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above <b>a. 9112-5331 ERG #31</b>			K. Handling Codes for Wastes Listed Above <b>EMERGENCY RESPONSE INFORMATION:</b> <b>Bob Nappels</b> <b>201-589-3709</b>		
If no alternate TSDF, return to generator					
15. Special Handling Instructions and Additional Information <b>If the designated facility does not accept the entire shipment, transporter or TSD facility shall notify the generator by telephone of the amount of waste being returned to the generator or alternate TSD facility. The transporter or receiving facility shall revise the manifest according to the generator's instructions, leave a copy of the generator's manifest at the designated facility and retain a copy of the manifest to deliver to the generator along with the rejected waste.</b> <b>Decal # 14765 NTDEP S-10342</b>					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name <b>MIKE BAXI</b>			Signature <b>Mike Baxi</b>		Month Day Year <b>03/27/92</b>
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>Fred Dupree</b>			Signature <b>Fred Dupree</b>		Month Day Year <b>03/27/92</b>
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name <b>Tom Scuderi</b>			Signature <b>Tom Scuderi</b>		Month Day Year <b>03/27/92</b>
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name <b>Michael Hudson</b>					
Signature <b>Michael Hudson</b>					
Month Day Year <b>03/31/92</b>					

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR

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Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS  
WASTE MANIFEST

NJD092217892

Manifest  
Document No.

2. Page 1  
of 1

Information in the shaded areas is not  
required by Federal law.

3. Generator's Name and Mailing Address

Reichhold Chemicals, Inc.

Attn: Bob Namjels

400 Doremus Avenue

Newark

, NJ

07105

(201) 589-3709

4. Generator's Phone (

5. Transporter 1 Company Name

NAPPI TRUCKING CORP

6.

US EPA ID Number

NJD0009813477

C. State Transporter's ID

PC 1009 H 319

D. Transporter's Phone

908-566-3000

7. Transporter 2 Company Name

8.

US EPA ID Number

E. State Transporter's ID

PC - - - - H - - -

F. Transporter's Phone

9. Designated Facility Name and Site Address

Rineco

1007 Vulcan Rd. - Haskell

Benton, AR. 72015

10.

US EPA ID Number

ARD981057870

G. State Facility's ID

H. Facility's Phone

501/778-9089

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

a. Hazardous Waste Solid, N.O.S.  
ORM-E NA9169

12. Containers

No.

Type

13. Total  
Quantity

14. Unit  
Wt/Vol

15. Waste No.

XX1 CM

XXXXX9T

U041; U147; U190

J. Additional Descriptions for Materials Listed Above

9112-5331 ERG 431

K. Handling Codes for Wastes Listed Above

EMERGENCY RESPONSE INFORMATION:

Bob Namjels

201-589-3709

if no alternate TSDF, return to generator

13. If the designated facility does not accept the entire shipment, transporter or TSD facility shall notify the generator by telephone of the amount of waste being returned to the generator or alternate TSD facility. The transporter or receiving facility shall advise the generator according to the generator's instructions, leave a copy of the generator's manifest at the designated facility, and retain a copy of the manifest to deliver to the generator along with the rejected waste.

DECAL # 14740

NJDEP S-10342

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

MIKE BAXI

Signature

Mike Baxi

Month Day Year

03/27/92

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

JOE REAGY

Signature

Joe Reagy

Month Day Year

03/27/92

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Michael Hudson

Signature

Michael Hudson

Month Day Year

03/31/92

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

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Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		Manifest Document No. 10101012		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address <b>Reckon Chemicals, Inc.</b> <b>400 Doremus Avenue</b> <b>Newark, NJ 07105</b> <b>(201) 589-3709</b>				A. State Manifest Document Number <b>AR- 546064</b>		B. State Generator's ID	
4. Generator's Phone (201) 589-3709				C. State Transporter's ID <b>PC 1009 H 319</b>		D. Transporter's Phone <b>908-566-3000</b>	
5. Transporter 1 Company Name <b>NAPPI TRUCKING CORP</b>				6. US EPA ID Number <b>NJ D0000813477</b>		E. State Transporter's ID <b>PC 1009 H 319</b>	
7. Transporter 2 Company Name <b>NAPPI TRUCKING CORP</b>				8. US EPA ID Number <b>NJ D0000813477</b>		F. Transporter's Phone <b>908-566-3000</b>	
9. Designated Facility Name and Site Address <b>Rinco</b> <b>1007 Vulcan Rd. - Haskell</b> <b>Benton, AR. 72015</b>				10. US EPA ID Number <b>ARD981057870</b>		G. State Facility's ID	
				H. Facility's Phone <b>501/778-9089</b>			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		13. Total Quantity	
a. <b>Hazardous Waste Solid, N.O.S.</b> <b>ORM-E NA9189</b>				No. Type <b>001 CM 00074T</b>		14. Unit Wt/Vol <b>U041, U147, U190</b>	
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above <b>1 9112-5331 ERG 431</b>				K. Handling Codes for Wastes Listed Above <b>EMERGENCY RESPONSE INFORMATION:</b> <b>Bob Nautelis</b> <b>201-589-3709</b>			
if no alternate TSDF, return to generator.							
15. Special Handling Instructions and Additional Information <b>If the designated facility does not accept the entire shipment, transporter or TSD facility shall notify the generator by telephone of the amount of waste being returned to the generator or alternate TSD facility. The transporter or receiving facility shall revise the manifest according to the generator's instructions, have a copy of the generator's manifest at the designated facility, and retain a copy of the manifest to deliver to the generator along with the rejected waste.</b> <b>DECAL # H-2579 14792 NJ DEP S-10342</b>							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name <b>ROBERT NAUTELIS</b>				Signature <i>Robert Nautelis</i>		Month Day Year <b>032592</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature <i>Joe Leahy</i>		Month Day Year <b>032592</b>	
Printed/Typed Name <b>JOE LEAHY</b>				Signature <i>Joseph Sciamie</i>		Month Day Year <b>032692</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature <i>Joseph Sciamie</i>		Month Day Year <b>032692</b>	
Printed/Typed Name <b>JOSEPH SCIAMIE</b>				Signature <i>Michael Hudson</i>		Month Day Year <b>032792</b>	
19. Discrepancy Indication Space				Signature <i>Michael Hudson</i>		Month Day Year <b>032792</b>	
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.				Signature <i>Michael Hudson</i>		Month Day Year <b>032792</b>	
Printed/Typed Name <b>Michael Hudson</b>				Signature <i>Michael Hudson</i>		Month Day Year <b>032792</b>	

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

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UNIFORM HAZARDOUS WASTE MANIFEST		Manifest Document No. 0101011		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address <b>Reichhold Chemicals, Inc.</b> <b>400 Doremus Avenue</b> <b>(201) 589-3709</b>		Attn: <b>Bob Naujels</b> <b>Newark, NJ 07105</b>		A. State Manifest Document Number <b>AR- 546061</b>		2			
4. Generator's Phone		5. Transporter 1 Company Name <b>MEROLA ENTERPRISES INC.</b>		6. US EPA ID Number <b>NJD 981057870</b>		C. State Transporter's ID <b>PC 1274530</b>			
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID <b>PC - - - - H - - -</b>		F. Transporter's Phone			
9. Designated Facility Name and Site Address <b>Rineco</b> <b>1007 Vulcan Rd. - Haskell</b> <b>Benton, AR. 72015</b>		10. US EPA ID Number <b>ARD 981057870</b>		G. State Facility's ID		H. Facility's Phone <b>501778-9089</b>			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.		
a. <b>Hazardous Waste Solid, N.O.S.</b> <b>ORM-E NA9189</b>				<b>X   X   CM</b>	<b>0   0   0   0   6   T</b>		<b>U041, U147, U190</b>		
b.									
c.									
d.									
J. Additional Descriptions for Materials Listed Above <b>a. 9112-5531 ERG #31</b>				K. Handling Codes for Wastes Listed Above <b>EMERGENCY RESPONSE INFORMATION:</b> <b>Bob Naujels</b> <b>201-589-3709</b>					
if no alternate TSDF, return to generator									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. <b>DECL # 1424 NJ DEP S-7277</b>									
Printed/Typed Name <b>MILCE BAXI</b>				Signature <b>Milce Baxi</b>				Month Day Year <b>03/25/92</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>JOHN GRECO</b>				Signature <b>John Greco</b>				Month Day Year <b>03/25/92</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature				Month Day Year	
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name <b>Michael Hudson</b>								Signature <b>Michael Hudson</b>	Month Day Year <b>03/27/92</b>

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

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UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address <b>Reichhold Chemicals, Inc.</b> <b>400 Doremus Avenue</b> <b>Newark, NJ 07105</b>		4. Generator's Phone <b>(201) 589-3709</b>		5. Transporter 1 Company Name <b>MEROLA ENTERPRISES INC</b>		6. US EPA ID Number <b>WJTD986609949</b>		A. State Manifest Document Number <b>AR-546062</b>	
7. Transporter 2 Company Name		8. US EPA ID Number		9. State Transporter's ID <b>PC 1274H 530</b>		10. Transporter's Phone <b>201-589-1600</b>		E. State Transporter's ID <b>PC - - - - H - - -</b>	
11. Designated Facility Name and Site Address <b>1007 Vulcan Rd. - Haskell</b> <b>Benton, AR. 72015</b>		10. US EPA ID Number <b>ARD981057870</b>		G. State Facility's ID		H. Facility's Phone <b>501/778-9089</b>			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. <b>Hazardous Waste Solid, N.O.S.</b> <b>ORM-E NA9189</b>		No. <b>1</b> Type <b>CM</b>		<b>7T</b>				<b>U041, U147, U190</b>	
b.									
c.									
d.									
J. Additional Descriptions for Materials Listed Above <b>1 9112-5331 ERG 151</b>		K. Handling Codes for Wastes Listed Above		EMERGENCY RESPONSE INFORMATION: <b>Bob Nantjells</b> <b>201-589-3709</b>					
if no alternate TSDF, return to generator									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name <b>MIKE BAXI</b>		Signature <b>Mike Baxi</b>		Month Day Year <b>03 25 92</b>					
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name <b>DANIEL W. MATTEVI</b>		Signature <b>Daniel W. Mattevi</b>		Month Day Year <b>03 25 92</b>			
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature		Month Day Year			
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.		Printed/Typed Name <b>Michael Hudson</b>		Signature <b>Michael Hudson</b>		Month Day Year <b>03 27 92</b>			

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

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Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <b>NJD092217892</b>	Manifest Document No. <b>000001</b>	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>Reichhold Chemicals, Inc.</b> <b>400 Doremus Avenue</b> <b>Newark, NJ 07105</b>		4. Generator's Phone <b>(201) 589-3709</b>		A. State Manifest Document Number <b>AR- 546059</b>	
5. Transporter 1 Company Name <b>NAPPI TRYCKING CORP</b>		6. US EPA ID Number <b>NJD0000813477</b>		C. State Transp <b>PC-1009 H-319</b>	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone <b>908-566-3000</b>	
9. Designated Facility Name and Site Address <b>Rinoco</b> <b>1007 Vulcan Rd. - Haskell</b> <b>Benton, AR. 72015</b>		10. US EPA ID Number <b>ARD981057870</b>		E. State Transporter's ID <b>PC H</b>	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone <b>501778-9089</b>	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. <b>Hazardous Waste Solid, N.O.S.</b> <b>ORM-E NA9189</b>		<b>XX1 CM</b>	<b>XXXXX15T</b>		<b>U041, U147, U190</b>
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above <b>a. 440-6331 ERG 431</b> <b>9203-1433mp</b>		K. Handling Codes for Wastes Listed Above EMERGENCY RESPONSE INFORMATION: <b>Bob Naujels</b> <b>201-589-3709</b>			
if no alternate TSD, return to generator					
15. Special Handling Instructions and Additional Information If the designated facility does not accept the entire shipment, transporter or TSD facility shall notify the generator by telephone of the amount of waste being returned to the generator or alternate TSD facility. The transporter or receiving facility shall revise the manifest according to the generator's instructions, have a copy of the generator's manifest at the designated facility, and retain a copy of the manifest to deliver to the generator along with the rejected waste. <b>DECAL # 14709, NJDEPS-10342</b>					
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Printed/Typed Name <b>MIKE BAXI</b>		Signature <i>Mike Baxi</i>		Month Day Year <b>032392</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>John SNEED</b>		Signature <i>John Sneed</i>		Month Day Year <b>032392</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name <b>DALE BAIRD</b>					
Signature <i>Dale Baird</i>				Month Day Year <b>032392</b>	

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842899944



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Form Approved. OMB No. 2050-0039. Expires 9-30-92

AR-11-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <b>NJD092217892</b>	Manifest Document No. <b>000002</b>	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>Reichhold Chemicals, Inc.</b> <b>400 Doremus Avenue Newark, NJ 07105</b>			A. State Manifest Document Number <b>AR-546060</b>		
4. Generator's Phone (201) 589-3709			B. State Generator's ID		
5. Transporter 1 Company Name <b>NAPPI TRUCKING CORP.</b>		6. US EPA ID Number <b>NJD0100813477</b>		C. State Transp <b>PC-1009 H319</b>	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone <b>908-566-3000</b>	
9. Designated Facility Name and Site Address <b>Rineco</b> <b>1007 Vulcan Rd. - Haskell Benton, AR. 72015</b>		10. US EPA ID Number <b>ARD981057870</b>		E. State Transporter's ID <b>PC - - - - H - - -</b>	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone <b>501778-9089</b>	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers	13. Total Quantity	14. Unit Wt/Vol
a. <b>Hazardous Waste Solid, N.O.S.</b> <b>ORM-E NA9169</b>			No. <b>XX</b> Type <b>1CM</b>	<b>XX</b>	<b>7T</b>
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above <b>a. 912-5531 ERG #31</b> <b>9203-1433MP</b>			K. Handling Codes for Wastes Listed Above <b>EMERGENCY RESPONSE INFORMATION:</b> <b>Bob Nappels</b> <b>201-589-3709</b>		
if no alternate TSDF, return to generator					
15. Special Handling Instructions and Additional Information <b>If the designated facility does not accept the entire shipment, transporter or TSD facility shall notify the generator by telephone of the amount of waste being returned to the generator or alternate TSD facility. The transporter or receiving facility shall revise the manifest according to the generator's instructions, have a copy of the generator's manifest at the designated facility, and retain a copy of the manifest to deliver to the generator along with the rejected waste. NJ DECAL 14700 S10342</b>					
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Printed/Typed Name <b>MIKE BAXI</b>			Signature <i>Mike Baxi</i>		Month Day Year <b>03,23,92</b>
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>JOSEPH SCIAPE</b>			Signature <i>Joseph Sciape</i>		Month Day Year <b>03,23,92</b>
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name			Signature		Month Day Year
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name <b>DALE BAILLARD</b>					
			Signature <i>Dale Ballard</i>		Month Day Year <b>03,25,92</b>

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842899945



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Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		Manifest Document No. NJD092217892		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address <b>Reichhold Chemicals, Inc.</b> <b>400 Doremus Avenue</b> <b>Newark, NJ 07105</b> <b>(201) 589-3709</b>				A. State Manifest Document Number <b>AR- 546058</b>							
4. Generator's Phone				B. State Generator's ID <b>59m2</b>							
5. Transporter 1 Company Name <b>AMERICAN INDUSTRIAL MARINE</b>				C. State Transporter's ID <b>PC 1278 H 535</b>							
6. US EPA ID Number <b>NJD 9811873664</b>				D. Transporter's Phone <b>908-756-4200</b>							
7. Transporter 2 Company Name				E. State Transporter's ID <b>PC --- H ---</b>							
8. US EPA ID Number				F. Transporter's Phone							
9. Designated Facility Name and Site Address <b>Rmeco</b> <b>1007 Vulcan Rd. - Haskell</b> <b>Benton, AR. 72015</b>				G. State Facility's ID							
10. US EPA ID Number <b>ARD 981057870</b>				H. Facility's Phone <b>501/778-9089</b>							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. <b>Hazardous Waste Solid, N.O.S.</b> <b>ORM-E NA9189</b>				No. Type		Quantity		Wt/Vol		Waste No.	
				X1X1 CM X1X1X13 T						U041, U147, U190	
b.											
c.											
d.											
J. Additional Descriptions for Materials Listed Above <b>1. 9112-5531 ERG 131</b> <b>9203-1433 NR</b>				K. Handling Codes for Wastes Listed Above <b>EMERGENCY RESPONSE INFORMATION:</b> <b>Bob Namjels</b> <b>201-589-3709</b>							
if no alternate TSDF, return to generator											
15. Special Handling Instructions and Additional Information If the designated facility does not accept the entire shipment, transporter or TSD facility shall notify the generator by telephone of the amount of waste being returned to the generator or alternate TSD facility. The transporter or receiving facility shall revise the manifest according to the generator's instructions, have a copy of the generator's manifest at the designated facility, and retain a copy of the manifest to deliver to the generator along with the rejected waste.											
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Printed/Typed Name <b>MIKE BAXI</b>				Signature <b>Mike Baxi</b>				Month Day Year <b>032392</b>			
17. Transporter 1 Acknowledgement of Receipt of Materials											
Printed/Typed Name <b>Garry W. Garry (Agent for AIMS)</b>				Signature <b>Garry W. Garry</b>				Month Day Year <b>032392</b>			
18. Transporter 2 Acknowledgement of Receipt of Materials											
Printed/Typed Name				Signature				Month Day Year			
19. Discrepancy Indication Space											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.											
Printed/Typed Name <b>DALE BAILLARD</b>				Signature <b>Dale Ballard</b>				Month Day Year <b>032694</b>			

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UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No. <b>NJD092217892</b>		Manifest Document No. <b>1010101</b>		2. Page 1 of		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address <b>Reichhold Chemicals, Inc.</b> <b>400 Doremus Avenue Newark, NJ 07105</b>				4. Generator's Phone <b>(201) 589-3709</b>		A. State Manifest Document Number <b>AR- 545923</b>			
5. Transporter 1 Company Name <b>AMERICAN INDUSTRIAL MARINE INC. NJD9811873664</b>				6. US EPA ID Number		C. State Transporter's ID <b>PC 1278 H335</b>			
7. Transporter 2 Company Name				8. US EPA ID Number		D. Transporter's Phone <b>908-756-4200</b>			
9. Designated Facility Name and Site Address <b>Rineco</b> <b>1007 Vulcan Rd. - Haskell Benton, AR. 72015</b>				10. US EPA ID Number <b>ARD981057870</b>		E. State Transporter's ID <b>PC H</b>			
						F. Transporter's Phone			
						G. State Facility's ID			
						H. Facility's Phone <b>501778-9089</b>			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		13. Total Quantity		14. Unit Wt/Vol	
a. <b>Hazardous Waste Solid, N.O.S. ORM-E NA9189</b>				No. Type <b>001 CM</b>		<b>00012</b>		I. Waste No. <b>UD41, U147, U190</b>	
b.									
c.									
d.									
J. Additional Descriptions for Materials Listed Above <b>a. ERG #31 9112-5331mp</b>				Truck#E22		K. Handling Codes for Wastes Listed Above EMERGENCY RESPONSE INFORMATION: <b>Bob Naujellis</b> <b>201-589-3709</b>			
if no alternate TSD, return to generator									
15. Special Handling Instructions and Additional Information If the designated facility does not accept the entire shipment, transporter or TSD facility shall notify the generator by telephone of the amount of waste being returned to the generator or alternate TSD facility. The transporter or receiving facility shall revise the manifest according to the generator's instructions, leave a copy of the generator's manifest at the designated facility, and retain a copy of the manifest to deliver to the generator along with the rejected waste.									
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Printed/Typed Name <b>ROBERT NAUJELIS</b>				Signature <i>Robert Naujellis</i>		Month Day Year <b>03/16/92</b>			
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <b>GARY W. GANEY (Agent for AIMS)</b>				Signature <i>Gary W. Ganey</i>		Month Day Year <b>03/16/92</b>			
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature		Month Day Year			
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name <b>Michael Hudson</b>				Signature <i>Michael Hudson</i>		Month Day Year <b>03/19/92</b>			

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## 2.0 SCOPE OF WORK

OHM's project objective is the safe and efficient decontamination of the facility. OHM understands the scope of work to consist of the following tasks:

- o Site Preparation
  - Pre-Project Planning
  - Site SetUp
- o Pre Sampling
- o Asbestos Removal
  - Site Preparation
  - Decontamination Systems
  - Abatement Procedures
  - Disposal
- o Decontamination
  - Building 31-5
  - Building 32-5
  - Building 31-4
  - Building 32-4
  - Building 32-1
  - Miscellaneous Cleaning of Columns
  - Process Solvent Lines
  - Storm Sewer and Drain Cleaning

In addition, the project will be performed in accordance with all applicable federal, state, and local regulations and guidelines concerning the handling and disposal of hazardous materials. OHM's approach to this project will maintain a high level of health and safety while providing cost and schedule control through our project management approach.

### 3.0 TECHNICAL APPROACH

As part of our review of the REICHHOLD facility and the remediation specifications, OHM has designed a proven technical approach for the decontamination of the site. Following numerous visits and Phase I work performed, we have developed an approach we feel meets all of OBG's cleanup specifications. This approach has been developed based upon our management of similar decontamination projects and OHM's commitment to complete the project within the 30 day requirement.

OHM understands the level of clean for this project as the removal of gross contamination caused by the explosion and fire and subsequent fire fighting activities.

#### 3.1 SITE PREPARATION

The following sections discuss our proposed methods for site preparation.

##### 3.1.1 Pre-Project Planning

After notification of award, OHM's project team will organize a preproject meeting with REICHHOLD and OBG. Important items to be resolved prior to the start of work include:

- o Review and acceptance of site specific Health-and-Safety Plan.
- o Review and acceptance of project schedule.
- o Operational coordination between OHM, its affiliates and REICHHOLD facility personnel.
- o Final contract negotiation.

We understand the coordination effort required to start and sustain a project of this size, while limiting the disturbance and disruption to the ongoing processes at the facility. Our project team will be on site full time to coordinate all project activities with REICHHOLD and your engineers.

##### 3.1.2 Site Setup

Site setup will consist of the mobilization of the project team, electricians, and the required representatives of our affiliates. All support equipment and supplies will be staged in convenient locations and the site will be set up to follow all OSHA and USEPA regulations.

OHM would like to set up its office trailers and support equipment in the same general vicinity that we occupied during Phase I which is near the front gate. A site drawing indicating OHM's location preference is included as Figure 3.1.2. The initial thrust of the setup will be to prepare the site for the removal of asbestos. However, tasks such as de-energizing buildings per our lock out, tag out procedure, equipment setup and supplies deliveries and will be formalized and implemented by the responsible party with the assistance of others.

### 3.2 PRESAMPLING

Under the direction of OHM's Site Supervisor and Transportation and Disposal Coordinator, we will conduct a presampling task in all areas to be decontaminated shortly after arriving on site. The goals of the presampling task are as follows:

- o Identify potential wastestreams.
- o Obtain enough materials from each potential waste stream for disposal analysis in advance.

To implement our sampling plan, we will require that REICHHOLD share with us their knowledge of possible materials used on site and the uses of each area. Section 4.0 (Waste Minimization and Management) describes how the regulation differs for the same contaminant and is the basis for this sampling plan.

After we have reviewed all available information, we will formalize and implement the sampling plan. In general, a composite sample will be obtained from each distinct area and analysis will be performed to identify possible contaminants.

### 3.3 ASBESTOS REMOVAL

Throughout the site there are various types of asbestos containing materials used largely as thermal insulation on mechanical and process piping and equipment.

The following paragraphs outline the procedures to be implemented during the asbestos abatement phase of this project.

Please note that all applicable government/regulatory agencies will be contacted to confirm their acceptance of practices and procedures to be used on this project.

### 3.3.1 Site Preparation

Abatement requiring the least amount of site preparation follow the NESHAPS procedures. The basic requirement for exterior abatement is the preparation of surfaces beneath the area in which work will be performed. This includes the pre-cleaning of ground surfaces where asbestos containing materials are present prior to gross removal. This will be accomplished using HEPA filter equipped vacuums and airless water sprayers to decontaminate the area once the larger pieces of asbestos materials have been properly bagged.

One layer of polyethylene sheeting will be placed on the ground beneath the abatement area. The outside edges of the polyethylene shall be elevated to create a diking effect for the collection of amended water used in the removal process. Interior abatement of friable asbestos containing materials will require a more extensive preparation phase. Critical barriers of 6 mil polyethylene sheeting shall be placed over all openings such as windows, doors, vents, etc. Draws and openings in the floor shall be sealed in the same manner to prevent contaminated water migration. Two layers of 6 mil polyethylene sheeting will be applied to floor surfaces. Wall surfaces will be power washed as part of the final cleaning phase, eliminating the preparation requirement.

Air filtration devices (AFDs) shall be used to create a negative-pressure differential. A sufficient number of AFDs shall be used to provide four air changes per hour. A three stage decontamination unit will be constructed adjacent to the work area to afford the proper decontamination of workers and the processing of bagged asbestos waste.

### 3.3.2 Decontamination Systems

For the interior abatement of friable asbestos material, an individual decontamination facility will be constructed adjacent to and connecting the work area to the decontamination area. This decontamination facility will be equipped with an equipment room, shower facility, and clean room for the donning of protective clothing. All technicians will be required to use this facility when entering or leaving the work area.

### 3.3.3 Asbestos Abatement Procedures

Abatement of friable asbestos containing material will be performed observing the NESHAPS visible emissions rule. Under this rule, visible airborne asbestos is not tolerated. Visible airborne asbestos generally takes the form of a small dust cloud which is easily eliminated with proper material wetting procedures. Once the exterior jacketing has been removed, the surface of underlying asbestos material will be saturated with amended water. These materials will be carefully placed into an asbestos bag and lowered to the ground. Ground crews will seal the first bag, place it in a second bag, and subsequently seal in the same manner. At the end of the shift, the bags will be placed in a local debris dumpster specifically designed for the transport of asbestos containing materials.

Due to the physical characteristics of the materials to be abated, and prior to the removal effort, complete saturation can be performed. This procedure aids in the control of airborne fiber concentrations within a contained area. At a minimum, powered air purifying respirators (PAPR) shall be worn by all technicians during the gross removal of asbestos in contained work areas.

### 3.3.4 Disposal Procedures

The following sections describe disposal procedures for the various materials encountered during the course of the project.

#### 3.3.4.1 Asbestos Materials

During the removal process, all friable asbestos containing material will be saturated with amended water. In this saturated form, the asbestos will be placed into 6 mil polyethylene bags while still inside the containment area. The bags will be passed through the decontamination facility where they will be placed inside a second 6 mil polyethylene bag before being transported to the solid waste container. Only preprinted bags bearing the prescribed "caution" label will be used.

Once a "notice to proceed" has been issued, OHM will provide the proper notification to the EPA, State agencies, and OSHA. When the government agencies are contacted, they will be invited to make a field inspection of the project site. Favorable agency relations will ensure a safe and fully documented successful project.

The on-site accumulation and storage of asbestos materials will be limited to solid waste containers not larger than 100 cubic yards. These containers will be cycled in and out on a routine basis. When the boxes are filled, the transporter will bring an empty box and transport the full box to the approved disposal site listed in Appendix B.

#### 3.3.4.2 Liquid Waste

Liquid waste will be generated from two primary sources. The first major source is the water used to saturate the insulation during removal. The excess water will be collected by various means and directed to a storage container or holding tank. From there, the water will be screened to remove gross contaminants and then pumped through a high-pressure, in-line filter to remove all fibers greater than 5 microns before discharge into a sanitary sewer. All wastewater will be cycled through the drain located in the decontamination trailer prior to discharge into sewage drain.

The second major source of contaminated water will be from the shower room in the decontamination area. This facility will use water to remove asbestos fibers from the decontamination technicians prior to exiting for lunch breaks and the end of a shift. This facility is outfitted with an integrated water-filter system capable of filtering fibers to 5 microns.

#### 3.3.4.3 Asbestos Contaminated Materials

Items which have become contaminated with asbestos containing materials, such as respirator cartridges, protective clothing, rags, and plastic sheeting will be disposed in the same manner as that described for asbestos materials.

#### 3.3.4.4 Regular Waste

Debris which is not contaminated or has been decontaminated will be disposed of in a separate dumpster and transported to a local dump site as normal construction debris.

### 3.4 DECONTAMINATION

The following sections describe our approach to successful decontamination of the sites. Our approach is based on the techniques of maximizing on-site work to time, thereby meeting Reichholds anticipated completion schedule of thirty days.

#### 3.4.1 Areas To Be Decontaminated

OHM will decontaminate the surfaces specified in O'Brien & Gere Engineers (OBG) specification for Bldg 31 and 32. The decontamination measures will include the following:

- o Gross removal of material from all surfaces using one or more of the following techniques:
  - High Pressure water blasting @ 10,000 psi
  - High Pressure water blasting at 10,000 psi with sand
  - Hand scraping and drumming of material
  - Application of cryogenic fluid to freeze material for removal
  - Scarification of floor surfaces
- o The cleaning, if necessary, of the interior of product lines and tanks.
- o Cleaning of sumps, drain pipes and trenches.

The techniques used will vary from area to area, but all will be chosen with the goal of removing the residue (gross product and surficial residue) or contamination. At this time, we do not anticipate and have not included subsurface cleaning of these areas. Criteria that might be established in the future may determine the necessity of subsurface cleaning. Section 3.11 describes our proposed decontamination techniques.

#### 3.4.2 Trench And Sump Cleaning

Products in the trench and sump will either be removed manually or by using a vacuum pump. Using a vacuum pump or truck, the liquid product will be removed for storage in on-site storage vessels, sampled and analyzed, and disposed accordingly or if possible, used as recycled water for the decontamination process. The solids will be sampled and analyzed, solidified if necessary, and disposed accordingly. After removal, the trenches will be high-pressured washed to remove all surficial accumulations.

#### 3.4.3 Drain Cleaning

Several of the upper floor drains are currently plugged. These lines must be cleared in order to assure proper collection of any liquids from the cleaning process.

Based on the drawings provided by OBG and conversations between OHM and OBG, the sewers connect and flow from the fifth floor to T-66 located on the first floor. The drains on the first floor collect through the trenches located in the floor and ultimately flow to the sump located in Bldg 31. These liquids are then pumped to T-66.

OHM will water blast the process floor drain lines using an NLB high pressure water blaster. Care must be taken in controlling the pressure of the machine so that the drains are not damaged. Drains that are partially obstructed will be cleared to allow maximum drainage. A vacuum pump will be used to collect the water/sludge from the lines until cleared. The water/sludge will be the water will be drained to either the sump, T-66 or OHM's on site storage tank.

Should a floor drain be clogged so severely that cleaning is not practical, OHM's Site Supervisor and OBG's Resident Engineer will identify which portions required removal. OHM will remove the specified section and install temporary PVC pipe in place of the removed piping. The plugged pipe will be staged for further inspection and classification for waste disposal. This option is offered as a time saving step. Productive time could be lost attempting to clean severely plugged pipe. Any delays may have an adverse affect on the timely completion of the project.

#### 3.4.4 Water Use Minimization

One of the key ingredients of this project will be the minimization of rinsates during the decontamination phase. In an effort to incorporate this into OHM's work plan, we have developed the following:

Initially, OHM will utilize fresh city water to operate its water blasters. The amount of water generated the water blasters is estimated at 3,000 gallons per hour. Three (3) high pressure water blasters will be used for this project. The water will be collected in the existing drains and sump or removed by vacuum pump and transferred to a 500 barrel Baker Tank or similar tank.

Two of these tanks will be stationed on-site. The water will be allowed to settle for a time thereby dropping out most solids. After the settling has occurred, OHM will batch the water via pump through a sand filter to trap any suspended solids and a carbon absorption unit to remove any potential volatiles. The purpose of the filtering is to protect the water blaster from internal damage from foreign matter. After filtration, the water will be pumped back to the water blasters for reuse.

OHM will continue to reuse the water until such a time as it becomes necessary to recharge with fresh water.

The tank sludges, filter sand and carbon will be sampled at some interval of the cleaning process to allow for timely analytical. Any waste generated from this process will be disposed of in accordance with the waste disposal portion of the contract.

#### 3.4.5 Decontamination Techniques

The following section describes the cleaning techniques OHM will employ for each specific area of Bldg's 31 & 32. The techniques are intended to achieve the results desired by Reichhold and OBG.

#### 3.4.6 Surface Cleaning

In many situations we will use any one or combination of the techniques listed below to remove residues from equipment, structures, and piping. The following removal methods are described in detail below:

- o Chipping hammer, scraping/wire brush--by using air-powered tools, hardened spades, and heavy-duty wire wheels, heavy, dried residues can be removed efficiently.
- o Sandblasting--another effective form of residue removal is sandblasting or high-density grit blasting. This technique can be used when very difficult residues exist.
- o Cryogenic Fluid Application--Since some of the material is in a viscous or semi viscous state making removal extremely labor intensive. This technique allows the material to be flash frozen, chipped and removed as a first step decontamination. Liquid Nitrogen (N<sub>2</sub>) to the anticipated fluid.
- o Shoveling--a labor-intensive yet effective approach when heavy, non-pumpable residues exist which are not easily accessible by mechanical means.



- o Hydroblasting--surface residues can be removed using high-pressure water [8,000 to 10,000 pounds per square inch (psi)]. A degreaser or surfactant may be added to the water, if necessary. Special adapters can be utilized to allow the use of san in addition to water.

#### 3.4.7 Process Lines

Line Breaking is a major task which precedes the decontamination work in each area. Important steps in line breaking are as follows:

- o Obtain line-entry permit from site-safety officer
- o Confirm/verify identity of line and internal pressure
- o Provide containment vessels/drums and sorbents at the work area
- o Wear appropriate personal protective clothing
- o Electrically ground line and/or contaminant vessel
- o Slowly break line to allow any contents to drain into container
- o Document activities

Each time a line is broken, we will ensure adequate holding capacity is available for the contents of the line. We will assume each line is full of liquid when we make the initial approach. We will identify "loops and pockets" which have an operable valve. A technician will slowly open the valve to determine if any liquid drains into the containers. If there are fluids present, draining will continue until the vessel/drum is nearly full.

Valves displaying integrity and operability will be used to control spillage. If this is not possible, we will slightly open flanges at the bottom and allow liquids to drain by using a controlled draining method on the lines.

If valves or flanges cannot be used, OHM will determine if lines are plugged by starting at the highest level of the pipe run and work downward. We will use a set of explosion-proof mechanical pipe cutters to tap the lines at areas (pipe legs or troughs) where product accumulation might be expected. We will collect product through a funnel-like collection device and drain the materials to a drum or tank. We will not mix incompatible materials.

#### 3.4.8 Line Flushing

If the flushing of product lines is required, it will be accomplished with enough water to equal two times the volume carried in that line during production. Effluent collected during the flushing operation will be collected and sent off site for disposal. This water will not be used in the recycle process discussed in Section 3.4.4.

In some instances, it may be cost-effective to ship the metal and remaining product as a hazardous waste, especially if the line is plugged and the material does not need to be incinerated.

#### 3.4.9 Tank Cleaning

Tank entry is controlled by use of the confined-entry permit, as described by our health-and-safety plan. Specific considerations include the following:

- o Obtain safety permits
- o Depressurize the vessel
- o Remove the hatch
- o Obtain explosimeter reading
- o Prevent spills with drip pans, sorbents, etc.
- o Identify tanks and materials
- o Estimate the quantity and verify material height

#### 3.4.10 Tank Decontamination

After the contents of a tank have been removed, if required, any lines leading to the tank will be flushed with water into the tank and collected by using a vacuum pump. Depending on the contents of the line, the line will be decontaminated with high-pressure water. Access will be made to the lines to the lines as necessary.

When the line decontamination residues have been removed from the tank, the tank will be decontaminated using high pressure water or sandblasting.

#### 3.4.11 Environmental Engineering Controls

Before decontamination operations are initiated, environmental engineering controls will be established to:

- o Prevent contaminant migration from the affected area
- o Prevent recontamination

- o Control the environment of the facility to enhance decontamination efficiency

Although pressure-washing activities are limited, when required we will locate, plug, and seal all drains and openings to outside areas. Temporary dikes will be installed at doorways leading to outside areas. Polyethylene barriers will be installed as required to prevent migration due to splashing and overspray. Washwater generated will be recovered using a vacuum recovery system or the floor drains for recycling.

To prevent the recontamination of surfaces during decontamination, operations will be initiated at ceilings and progress downward, finishing with the floors.

Another means of controlling contaminant migration is the control of personnel movement to prevent the "tracking" of contaminants to outside areas. To accomplish this, zones of contamination and access-control points to each zone will be established. Zone boundaries will be clearly marked using barrier tape.

Personnel will be assigned to specific areas and restricted to that zone until they have removed their protective booties and gloves at the designated access-control point. At each access-control point, protective booties, gloves, and Tyvek suits will be accessible and donned when crossing the change line. The assignment of personnel to specific areas will maximize production time, minimize expendables used, and eliminate the potential for contamination migration due to personnel movement around the facility.

#### 3.4.12 Verification

An important element of any decontamination project is the use of effective work verification and tracking systems. OHM has developed and refined a system which we have used successfully and are currently using on similar decontamination projects. The following are the essential elements to this system:

- o Cleaning Certification--this form provides for approval and comment of each completed work activity. It is executed by both the client and the OHM representative.
- o Daily Progress Report--summarizes each day's activities.
- o Subcontractor's Daily Work Summary--completed daily by each subcontractor to document activities.
- o Foreman's Daily Work Plan--generated at the start of each day to clearly specify the work expectations. Documents daily site-safety meeting agenda.

- o Site-Safety Officer Report--reports any project aspect related to health and safety and site inspections.
- o Checklist for Transportation and Disposal--provides quality control/quality assurance (QA/QC) to ensure each load of material sent off site complies with appropriate regulations and with project guidelines.

### 3.5 SPECIFIC WORK BREAKDOWN

OHM has prepared the following sections describing the specific levels of effort OHM feels is required to achieve the desired results. We have also dedicated the necessary resources to complete this project in the required time frame.

#### 3.5.1 Bldg 31-5

This is the particular floor which suffered the most severe damage and will require the most extensive cleanup. OHM has segregated the floor in this area into four grids: NE, NW, SW, SE. The level of effort for each grid is as follows with the most severe first.

The SW grid is the location where the explosion occurred. Damaged equipment and piping exist as well as heavy resin covering the floors, walls, ceiling and equipment. OHM will employ the following cleaning techniques the remove the resins from this area;

For resins not hardened, the use of cryogenic fluids such as CO2 or N2 would be applied to the resin causing it to "freeze" for a period of time. Working in a specific pattern, OHM personnel would remove the "frozen" and drum the material for disposal. This technique would be used for the heavy accumulations on the floors, walls and equipment. OHM would not employ this method on the ceiling due to safety considerations. OHM may at some point attempt a ceiling application for test purposes.

Once sufficient heavy accumulations have been removed, the surfaces would be cleaned by High pressure water blaster and sand if necessary simultaneously with cleaning of the other grids. Rinse water will be collected for recycling as indicated in the water minimization section.

OHM will work with the resident engineer from OBG to determine the cost effectiveness of the removal and disposal of insulation jacketing versus cleaning.

The wall on the North side of the building requiring removal will be taken out utilizing pneumatic tools and manual labor. The bricks will be lowered to grade via a demolition chute to an awaiting dumpster. All personnel involved in this task will be protected from falls by safety lanyards when working in the vicinity of the opening. Some roof work may be necessary to remove a portion of the parapet. Once the damaged wall has been completely removed, a temporary wooden structure will be built across the opening approximately six feet high.

OHM will make arrangements to remove the forklift trucks which are coated and obstructing the floor area after decontamination. The drums of raw materials will remain until a clear path can be made along the floor to facilitate their removal. Drums laying on their sides will be righted and stabilized and leaking drums handled on a case by case basis.

OHM will support T-125 as required to perform any necessary cleaning.

The SE grid area is the next most seriously affected area. This is due primarily to the damage and spillage of resin in the Hot Room.

Several inches of resin are contained within the room which has a spill dike across the doorway. The roll up door is destroyed and requires some dismantlement prior to commencement of work. OHM will apply the same technique for the removal of the resins in this grid area as used in the SW grid.

OHM will remove the cinder block wall of the Hot Room that is compromised. This will aid in the removal of the off spec finished product drums inside. The brick will be handled similarly to the brick removed from the north wall.

The remaining two grid areas (NW & NE) are debri laden and require a large amount of manual labor to remove debri and prepare the area for cleaning. Some of this includes the removal of cinder block rubble and metal blown out by the explosion. Drums in this area will be removed as accessways become cleared.

Any process piping requiring internal draining and cleaning will be performed in accordance with OHM pipe cleaning Section 3.4.7 and 3.4.8.

OHM estimates this task to be completed by two crews of five men in ten days.

### 3.5.2 Bldg 32-5

In this portion of the building, raw materials used in the manufacture of Reichholds products were stored. Due to the explosion and subsequent fire, severe damage was incurred. Raw materials which were palletized were exposed due to the fire and fire fighting efforts. These actions left a coating of material over the entire floor area. Also, as a result of the fire, the roof became compromised. Structural shoring is currently in place supporting the damaged section.

Four area need to be addressed in this section of the building:

Removal of rubble and debri from the storage area and the peroxide storage room

Installation of additional shoring along the Southern portion of the floor

Removal of raw materials

#### Decontamination of the entire floor area and drains

OHM will utilize the fork lift already on the floor for the removal of the raw materials. Using the existing opening in the wall, the material will be lowered by crane to grade where the insurance adjuster will determine salvageability. Material to be scrapped will be segregated for proper disposal.

The additional shoring will be installed by OHM personnel familiar with this particular type of material. The scaffolding will be installed in accordance with the existing blueprints and manufacturers specifications. Note: The original shoring was installed by OHM during Phase I operations.

Any material that is not contaminated will be handled as industrial trash. This may include bricks, boxes, cans and other debris from Bldg 32. This material will be removed and lowered to an awaiting rolloff by way of a demolition chute.

Once the floor has been cleared of all obstacles, OHM employees will utilize high pressure water blasters to decontaminate the floor. The rinsates will be discharged through the floor drains or removed by vacuum pump to the collection points.

OHM estimates that the time required to complete this task is eight days.

#### 3.5.3 Bldg 32-4 and 31-4

Initial activities in this are the removal of large amounts of raw and finished products in drums and on pallets. OHM will work closely with OBG and Reichhold to facilitate the smooth handling of this material.

Prior to the decontamination phase, the clearing of the sewers is necessary. These lines will be cleared the lines using the NLB high pressure water laser.

The area requiring decontamination contains approximately 20 vessels used for storage in Bldg 32-4. Space for maneuverability is limited as is the lighting. OHM will place flood lamps (water tight) as needed to properly illuminate the work area as well as portable scaffolding to facilitate reaching the ceilings and high points.

Prior to any cleaning, OHM personnel will clear the floor of any bulk solids, loose debris, raw materials and any buildup of materials on the walls and ceilings including the expansion joints.

Based on the site visits, OHM feels that the continued use of the NLB high pressure water laser is sufficient to achieve the desired level of removal. The decontamination will include all ceilings, floors, walls, equipment exteriors, pipe exteriors and associated equipment.

OHM estimates that the time required to complete this task is eight days.

#### 3.5.4 Bldg 32-3&2, 31-3&2

There is minimal damage to these floors other than water damage and seepage of some products through the expansion joints. The loose material will be collected and removed for disposal. If necessary, the NLB water laser will be utilized to remove any gross accumulations. OHM will sweep the floor around where the material was collected. There is no scheduled decontamination of these floors.

The floor drains and storm sewer lines will be cleaned in accordance with that specified in other sections.

OHM estimates the time to complete this task as four days.

#### 3.5.5 Outside Areas

OHM proposes to use a bobcat with scarifier for the removal of any accumulations on the facility roadways. This machine would remove only the top layer of material without removing large amounts of asphalt. The material would be collected for proper disposal.

Any accumulated debris from the incident will be accumulated for inspection and determination of any hazard. Non hazardous materials will be disposed of as industrial trash while any item suspected as hazardous will be segregated for proper disposal.

OHM estimates the time to complete this task is one day.

III. WORK PLANS

842899963



IV. HEALTH AND SAFETY PLANS - WITHOUT ATTACHMENTS

842899964

V. A FINAL REPORT/ANALYSIS

842899965

May 5, 1992

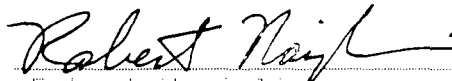
There were a total of 41 roll-off boxes, which contained chemicals that were removed from the 3rd, 4th, and 5th floor of buildings 31 and 32. Personal protective equipment, and miscellaneous debris, such as packaging materials, were included in this waste stream. There are a total of 4 Phase I roll-offs remaining to be disposed of.

Removal of materials from the buildings was carried out during Phase I and Phase II of the project. Phase I materials were shipped to Rineco Chemicals Inc. for blending into fuels. Phase I materials consisted primarily of chemicals which had washed to the floor from broken bags and sacks. Phthalic Anhydride, a land ban substance, was stored on the 5th floor. Because the phthalic anhydride could not be isolated, all Phase I materials were blended for fuel rather than land-filled.

On completion of Phase I, the remaining 5th floor chemicals were inventoried. There was no phthalic anhydride remaining. Accordingly, most Phase II chemicals were land-filled, in a secure landfill at GSX Services, Inc.

All 55 gallon drums and pails that were being used to accumulate hazardous waste resins, solvents, and filter cake, have been disposed of as fuel blending material at Petrochem, Inc., in Detroit, Michigan.

Other chemicals will be disposed of as they are generated or evaluated for use.

  
Robert Naujalis

842899966



State of New Jersey  
Department of Environmental Protection and Energy  
CN 402  
Trenton, NJ 08625-0402

Scott A. Weiner  
Commissioner

MAR 09 1992

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Kent Taylor  
Plant Manager  
Reichhold Chemicals, Inc.  
400 Doremus Avenue  
Newark, New Jersey 07105

Re: Discharge Confirmation Report for Case No. 92-01-11-0147-00

Dear Mr. Taylor:

Thank you for your Discharge Confirmation Report of February 7, 1992 regarding the above referenced Case Number.

I appreciate your confirmation and the opportunity to clarify the Department's rules for notification and reporting of discharges of hazardous substances.

Upon review of the report the following deficiencies were discovered:

- 1) A site map identifying the areas on land in which the discharge occurred and the surrounding areas.
- 2) A map identifying the areas on water affected by the discharge.

These deficiencies must be addressed in order for your report to satisfy the requirements of N.J.A.C. 7:1E-5.8(b). The required information must be submitted to the Bureau of Discharge Prevention within 30 calendar days of receipt of this letter.

If you have any questions regarding this letter, please contact Philip Polios at 609-633-0610.

Your cooperation in this matter is greatly appreciated.

Sincerely,

Beth S. Reddy, Section Chief  
Bureau of Discharge Prevention

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Recycled Paper

842899967

# CONFIRMATION REPORT CHECKLIST

N.J.A.C. 7:1E-5.8(b)

Facility: Reichhold Chemicals

Case #/Date of Discharge: 92-01-11-0147-00

## Information

## Provided

1. Name, address, telephone # of individual that reported the discharge.

Yes [☒] No [ ]

2. Name, address, telephone # of individual submitting the report, if different than 1 above.

Yes [☒] No [ ] N/A [ ]

3. Name, address, telephone # of individual subject to provisions of this subchapter if different than 2 above.

Yes [ ] No [ ] N/A [☒]

4. Name, address, telephone # of person(s) responsible for the discharge.

Yes [☒] No [ ]

5. Name, address, telephone # of each owner and operator of the facility.

Yes [☒] No [ ]

6. Source of the discharge.

Yes [☒] No [ ]

7. Location of Discharge.

i. For discharges on land:

Yes [☒] No [ ] N/A [ ]

\* Name of the site;

Yes [☒] No [ ]

\* Street address;

Yes [☒] No [ ]

\* Tax lot and block;

Yes [☒] No [ ]

\* Municipality;

Yes [☒] No [ ]

\* County;

Yes [☒] No [ ]

\* Department or EPA ID #s;

Yes [☒] No [ ]

\* Site map identifying the area the discharge occurred & surrounding area.

Yes [ ] No [☒]

ii. For discharges on, under, or into water:

Yes [☒] No [ ] N/A [ ]

\* Name of the water body;

Yes [☒] No [ ]

\* Latitude & longitude of the place the discharge originated;

Yes [☒] No [ ]

\* Map identifying affected areas.

Yes [ ] No [☒]

8. List of common name and CAS # of each hazardous substance discharged.

Yes [☒] No [ ]

9. List of the quantities of each substance discharged, including estimates.

Yes [☒] No [ ]

10. Chronological information.

\* Date & Time discharge began;

Yes [☒] No [ ]

\* Date & Time discharge discovered;

Yes [☒] No [ ]

\* Date & Time discharge ended;

Yes [☒] No [ ]

\* Date & Time discharge reported to NJDEPE.

Yes [☒] No [ ]

11. \* Detailed description of measures to contain, cleanup, and remove discharge; Yes ☒ No ☐  
 \* Summary of costs incurred; Yes ☒ No ☐  
 \* Proof of proper disposal of all hazardous substances discharged. Yes ☒ No ☐
12. Corrective actions or countermeasures taken, including equipment repairs or replacements. Yes ☒ No ☐
13. Additional preventative measures taken or proposed to minimize a recurrence. Yes ☐ No ☐ N/A ☒
14. Name, address, telephone # of all entities involved in the containment, cleanup, and removal of the discharge. Yes ☒ No ☐ N/A ☐
15. Sample information: Yes ☒ No ☐ N/A ☐  
 \* Sample type; Yes ☒ No ☐  
 \* Quantity; Yes ☒ No ☐  
 \* Location; Yes ☒ No ☐  
 \* Date. Yes ☒ No ☐
16. Sample Results: Yes ☒ No ☐ N/A ☐  
 i. Name, address, telephone # of person(s) conducting sample analyses; Yes ☒ No ☐  
 ii. QA/QC procedures used in sample collection and analyses; Yes ☐ No ☒  
 iii. Rationale for location, number, and frequency of samples collected; Yes ☐ No ☒  
 iv. Description of sample methodology; Yes ☐ No ☒  
 (1) Types of sample containers & closures, cleaning procedures for sample containers/ closures and sampling equipment; Yes ☐ No ☒  
 (2) Use of QA samples (blanks & duplicates) Yes ☐ No ☒  
 (3) Groundwater monitoring well permit #s, designs, & installation techniques; Yes ☐ No ☒ N/A ☒  
 (4) Chain of custody procedures & sample documentation; Yes ☒ No ☐  
 v. Description of analytical methodologies and rationale for selecting parameters & analytical methodologies; Yes ☐ No ☐  
 vi. Results in concentrations of each hazardous substance analyzed. Yes ☒ No ☐
17. For major facilities, a certification of financial responsibility pursuant to N.J.A.C. 7:1E-4.5 and 4.4(a)9 is in full force and effect. (Not required until plan submission; voluntary submission if available) Yes ☒ No ☐ N/A ☐
18. Information supplementing previously provided information. Yes ☒ No ☐ N/A ☐
19. Other information requested by NJDEPE. Yes ☐ No ☐ N/A ☒
20. Certification pursuant to N.J.A.C. 7:1E-4.11. Yes ☒ No ☐
- Administratively Complete. Yes ☐ No ☒

Revised (2/25/92)

842899969

**Reichhold Chemicals, Inc.**  
Coating Polymers & Resins Division  
400 Doremus Avenue  
Newark, NJ 07105

**REICHHOLD**

March 17, 1992

NJ DEPE  
Bureau of Discharge Prevention  
CN 402  
Trenton, NJ 08625-0402  
Attn.: Ms. Beth Reddy

RE.: Discharge Confirmation  
Report Case # 92-01-22-0147-00

Dear Ms. Reddy:

Per your request regarding the above referenced report, enclosed is a site map outlining areas where discharges occurred.

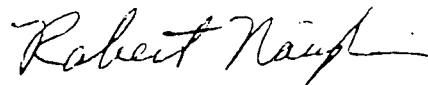
Poly-N-Butyl Acrylate resin was sprayed onto buildings and into the yard areas shown. This material, having the consistency of hard sticky globules, has been removed from most yard areas.

Water from sprinkler systems and fire hoses drained from the building and accumulated in the areas shown. Some of this water, volume unknown, drained into Newark Bay on the out-going tide. The balance, 20,000 gallons, was collected in tanker trucks.

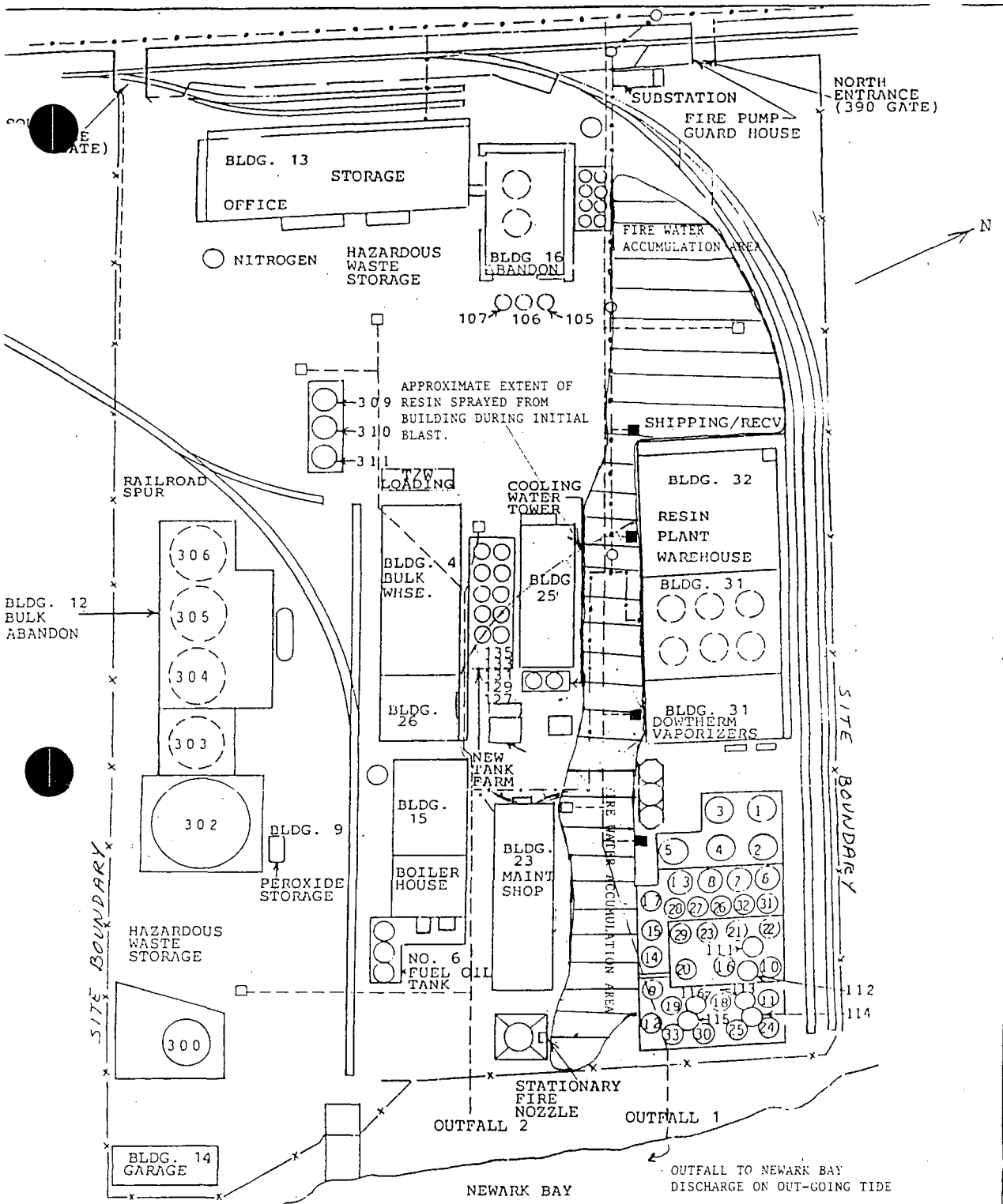
If you have any further questions regarding this matter, please contact me at the below listed telephone number.

Thank you.

Sincerely,

  
Robert Naujelis  
Environmental Engineer

RN/glm  
cc: K. Taylor



OVERALL SITE PLAN





**State of New Jersey**  
**Department of Environmental Protection and Energy**  
Division of Environmental Safety, Health and Analytical Programs

CN 424  
Trenton, NJ 08625-0424  
Tel. # 609-633-7964  
Fax. # 609-292-5450

12-13-1  
8 (819)

Jeanne M. Fox  
Acting Commissioner

Gerald P. Nicholls, Ph.D.  
Director

Mr. Mike Baxi  
Environmental Engineer  
Reichhold Chemicals, Inc.  
45 Cornelia St.  
Newark, NJ 07105

JAN 24 1994

RE: Discharge Confirmation Report for Case No. 93-08-13-1402-49

Dear Mr. Lucas:

Thank you for your discharge confirmation report of September 10, 1993 confirming your telephone notification made to the NJDEPE hotline on August 13, 1993.

After review of your Discharge Confirmation Report, the Bureau of Discharge Prevention finds that the requirements of N.J.A.C. 7:1E-5.8 are satisfied. This report will become part of your facility's file, and the incident will be reviewed with respect to the provisions of N.J.A.C. 7:1E-6.

If we have any further questions regarding this incident we will contact you.

Your cooperation in this matter is greatly appreciated.

Sincerely,

*Frank J. Cosolito /for*

Darryl C. Jennus, Chief  
Field Verification Section  
Bureau of Discharge Prevention

c: Stafford Stewart, Prin. Env. Engr.

842899972

**Reichhold Chemicals, Inc.**

Coating Polymers & Resins  
46 Albert Avenue  
Newark, New Jersey 07105

**REICHHOLD**

September 10, 1993

Bureau of Discharge Prevention  
New Jersey Department of Environmental Protection  
401 East State Street  
CN 027  
Trenton, NJ 08625-0027  
Attn.: Discharge Confirmation Report

RE: Case # 93-8-13-1402-49

Dear Sirs:

Item 1. Person who notified the department:

Mike Baxi, Environmental Engineer  
Reichhold Chemicals, Inc.  
45 Cornelia Street  
Newark, NJ 07105  
Telephone: (201) 589-3871

Item 2. Person who is submitting a confirmation report:

Mike Baxi, Environmental Engineer  
Reichhold Chemicals, Inc.  
45 Cornelia Street  
Newark, NJ 07105  
Telephone: (201) 589-3871

Item 3. Not applicable

Item 4. Person responsible for discharge:

Not applicable.

Item 5. A. Owner & operator of the facility:

Reichhold Chemicals, Inc.  
45 Cornelia Street  
Newark, NJ 07105  
Telephone: (201) 589-3871

Item 6. The source of discharge:

Faulty shut-off valve on diesel fuel dispenser. Tractor  
fuel tank overfilled.

Item 7. The location of discharge:

Reichhold Chemicals, Inc.  
45 Cornelia Street  
Newark, NJ 07105  
Essex County  
Tax Lot: 24  
Block #: 2452  
Site map attached

Item 8. Common name and CAS no. for hazardous substance discharged:

Fuel Oil No. 2, (Diesel Fuel)  
CAS No.: 68476-34-6

Item 9. Quantity of discharged substance:

Approximately 15-20 gals. fuel oil No. 2.

Item 10. Date & Time:

Date discharge began:	8/13/93
Time discharge began:	Around 4:00 a.m.
Date discharge discovered:	8/13/93
Time discharge discovered:	Around 4:00 a.m.
Date discharge ended:	8/13/93
Time discharge ended:	Around 4:00 a.m.
Date department notified:	8/13/93
Time department notified:	1:55 p.m.

Item 11. Description of measures taken:

Speedi-Dry placed on spill. Retained American Industrial Marine of Dunnellen, NJ, to scrape the spilled materials from parking lot into 55 gallon steel drums. (See cleanup report attached.) American Industrial Marine dug up approximately 6" of soil, gravel and macadem surface in spill area. Pavement was encountered at approximately 6" depth, which prevented release of material into underlying soils. No further action is required. Approximate costs to remove and dispose of material was \$3,000.00. A copy of waste disposal manifest is attached.

Item 12. Corrective action:

Diesel fuel tank replaced with new double walled tank and new diesel pump dispenser, equipped with automatic shut-off. Area where tractors filled fully contained to prevent recurrence.

Item 13. Preventive measures proposed to minimize the possibility of recurrence.

Trucking facility personnel received training reinforcing procedures to follow when filling gas tanks. Drivers will remain in attendance at all times during filling. Personnel to attend additional training on reporting of spills.

Item 14. All entities involved in containment, clean-up:

American Industrial Marine Services  
P.O. Box 4048, Dunnellen, NJ 08812  
(908) 746-4200

Item 15. Samples of discharge:

One composite sample collected from soil pile and analyzed for total petroleum hydrocarbons (TPHC). Sample collected August 16, 1993.

Item 16. Results of sample:

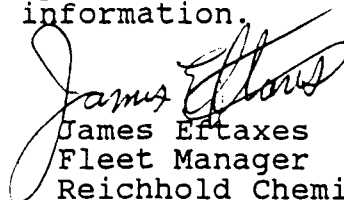
See attached analytical results for the sample collected.

Item 17. Financial responsibility demonstrated pursuant to N.J.A.C. 7:1E-4.5 and submitted to the Department pursuant to N.J.A.C. 7:1E-4.4(a) is in full force and effect.

Item 18. Spill was originally reported to NJDEPE Spill Reporting Hotline (Case No.: 93-8-13-1402-49) as a storage tank overfill. We have since discovered cause of spill to be faulty fuel dispensing pump which caused tractor fuel tank to overfill.

Item 19. Not applicable.

Item 20. I certify under penalty of law that the information provided in this document is true, accurate and complete. I am aware that there are significant civil and criminal penalties, including fines or imprisonment or both, for submitting false or inaccurate information.

  
James Eftaxes  
Fleet Manager  
Reichhold Chemicals, Inc.  
45 Cornelia Street  
Newark, NJ 07105

**Reichhold Chemicals, Inc.**

Coating Polymers & Resins

46 Albert Avenue

Newark, New Jersey 07105

**REICHHOLD**

N.J.A.C. AFFDAVIT

SUPPORTING LATE REPORT

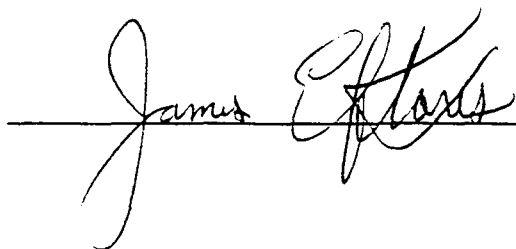
Affadavit of James Eftaxes of Reichhold Chemicals, Inc. to ,  
notary public:

My name is James Eftaxes and my position is Fleet Manager for the Reichhold Chemicals Trucking Facility at 45 Cornelia Street in Newark, N.J. I was in charge of the trucking facility at the time of the release which occurred on August 13, 1993, around 4:00 a.m.

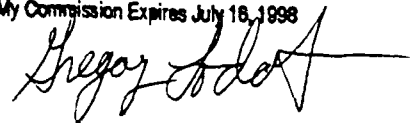
The incident was first reported to my by car phone in Maryland (1:30 p.m.) during my day off. I immediately contacted Mike Baxi, an environmental engineer with Reichhold. After investigating the release, Mike Baxi notified the NJDEPE Spill Reporting Hotline by telephone around 1:55 p.m., August 13.

The reason the spill was not reported to NJDEPE within 15 minutes of discovery was that workers at the trucking facility were not aware of New Jersey's spill reporting requirements. Personnel at the site took appropriate response measure to contain the spill on-site. We have since hired an outside hazmat contractor to remove gravel, pavement, and sorbent materials affected by the release. Training will be conducted to reinforce procedures for properly reporting releases to the appropriate contacts in a timely manner.

Based upon my information and belief, I swear that the foregoing statement is true.

 9/10/93

GREGORY LODATO  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires July 18, 1998



**AMERICAN INDUSTRIAL MARINE SERVICES, INC.**

September 9, 1993

Reichhold Chemical, Inc.  
46 Albert Street  
Newark, New Jersey 07101

ATTN: Mr. Mike Baxi

Dear Mr. Baxi,

American Industrial Marine Services, Inc. (AIMS), on August 13, 1993, responded to a spill at Reichhold Chemical, Inc., located on Albert Street in Newark, New Jersey. All free product was cleaned up and drummed for disposal. On August 16, 1993, AIMS returned to remove the stained quarry process in the parking lot.

Using a 580K Backhoe, the contaminated soil was removed. All soils were stockpiled on 6 mil plastic sheeting. After removal of approximately 12 inches of contaminated soil, AIMS found pavement. The areas of contamination were removed and there still was pavement intact in the cleaned area. Samples were not taken due to the presence of the pavement. A composite sample of the stockpile was taken and analyzed, Reichhold has been forwarded the analytical results. Airborne sampling was accomplished with an HNL Meter. A site map was drawn to show the locations the readings were taken and the level of the readings.

Sincerely,

AMERICAN INDUSTRIAL  
MARINE SERVICES, INC.

David Oliver  
Account Representative

DO/idm

842899977



**AllService  
Testing** INC.

TEL. (908) 214-TEST

Franklin Technical Center  
72 Veronica Avenue  
Somerset, N.J. 08873

**ANALYTICAL REPORT PACKAGE**

**FOR**

**AMERICAN INDUSTRIAL MARINE SERVICES  
1630 SOUTH SECOND STREET  
PLAINFIELD, NJ 07060**

**PROJECT**

**DIESEL SPILL**

**ALLSERVICE TESTING CASE NUMBER**

**C-11124**

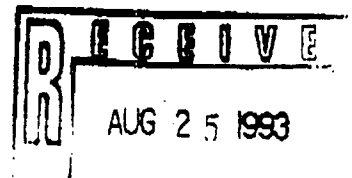
**ALLSERVICE TESTING, INC.  
NEW JERSEY CERTIFICATION NUMBER 18712**

REVIEWED AND APPROVED BY

  
**GLORIA S. LEGASPI  
LABORATORY MANAGER**

DATE REPORTED

August 23, 1993



N.J. DEP-CERTIFIED, POTABLE WATER/POLLUTED WATER

AMERICAN IND. MARINE

842899978



Date Received: August 17, 1993  
Date Reported: August 23, 1993

SAMPLE SUMMARY			
LAB #	SAMPLE ID	COLLECTED DATE/TIME/BY	SAMPLE DESCRIPTION/ POINT OF COLLECTION
3640		8/16/93 Dave Richards	Soil Stockpile





August 23, 1993

CLIENT: American Industrial Marine Services  
LAB # : 3640

PETROLEUM HYDROCARBONS

<u>RESULT</u>	<u>MDL</u>	<u>UNITS</u>
10662	715	mg/kg

ND = Not Detected above MDL  
MDL = Method Detection Limit

Environmental Testing Laboratories  
NJ / PA Certified

842899980

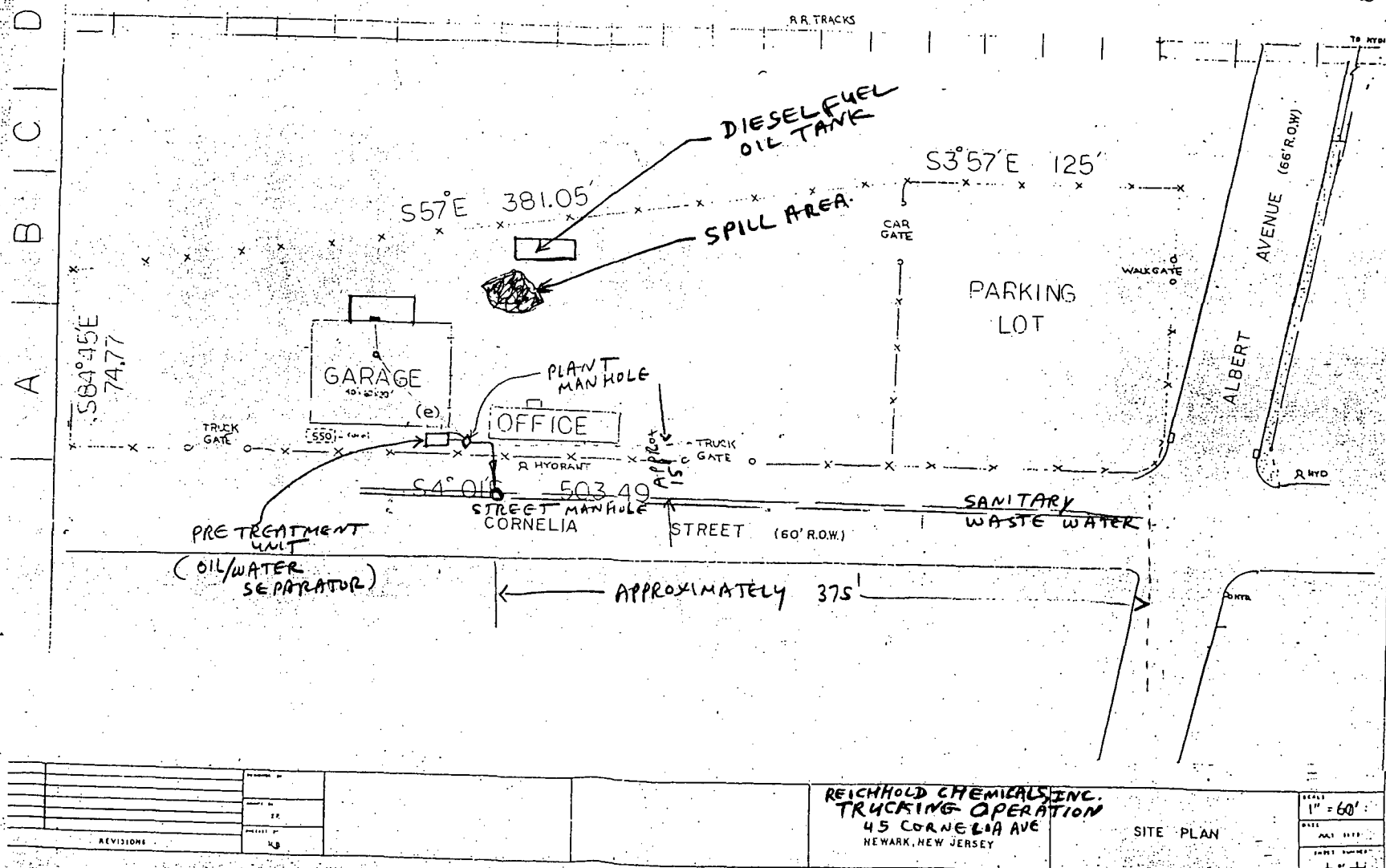


1630 SOUTH SECOND STREET  
PLAINFIELD, NEW JERSEY 07000

# CHAIN OF CUSTODY

Company Name <b>REICHOLD CHEMICAL</b>					No. of con- tainers	TESTS										
Project Name <b>DIESEL SPILL</b>						<div>TPH</div>										
Samplers: <b>DAVE RICHARDS</b>																
	Date	Time	Comp.	Grab	Station Location											Remarks
	8-16-93		X		Soil Stockpile	1	X									Normal TAT
Relinquished by: (Signature) <i>Dave Richards</i>			Date/Time 8-17 10:20		Received by: (Signature) <i>[Signature]</i>		Relinquished by: (Signature)			Date/Time		Received by: (Signature)				
Relinquished by: (Signature)			Date/Time		Received by: (Signature)		Relinquished by: (Signature)			Date/Time		Received by: (Signature)				
Relinquished by: (Signature)			Date/Time		Received for Laboratory by: (Signature)			Date/Time		Remarks						

842899981





**State of New Jersey**  
**Department of Environmental Protection and Energy**  
Division of Environmental Safety, Health and Analytical Programs  
Trenton, NJ 08625

Scott A. Weiner  
Commissioner

Gerald P. Nicholls, Ph.D.  
Director

MAY 19 1993

Paul Brustofski  
Reichhold Chemicals, Inc.  
P.O. Box 13582  
Research Triangle Park, NC 27709-3582

RE: Discharge Confirmation Report for Case No. 93-03-19-1136-39

Dear Mr. Brustofski:

Thank you for your correspondence of March 25, 1993, confirming your telephone notification made to the NJDEPE hotline on March 19, 1993.

Your notification to the NJDEPE hotline, in accordance with your standard operating procedure, was appropriate. We understand that the incident reported is not considered a discharge since the material involved was not a hazardous substance.

Your written confirmation enables us to close our file on this case. In the future, any notification to the department hotline should be followed up with either a discharge confirmation report or an explanation as to why the incident notification is to be cancelled, as you have done in this case.

Should you have any questions regarding this correspondence, please contact Audrey Sherba of my staff at (609) 292-1690.

Your cooperation in this matter is greatly appreciated.

Sincerely,

*Philip Polio for*  
Beth S. Reddy, Chief  
Engineering Review Section  
Bureau of Discharge Prevention

c: A. Sherba, Princ. Env. Eng.

**Reichhold Chemicals, Inc.**

Corporate Headquarters  
P.O. Box 13582  
Research Triangle Park, NC 27709-3582

March 25, 1993

**REICHHOLD**

Bureau of Discharge Prevention  
NJDEPE  
401 East State Street  
CN 027  
Trenton, NJ 08625-0027  
ATTN: Discharge Confirmation Report

RE: Case No. 93-3-19-1136-39

Dear Bureau Member:

This letter is in follow-up to a spill reported at 11:30 a.m. on March 19, 1993 to the Department's Spill Reporting Hotline Number (609-292-7172), assigned the case number 93-3-19-1136-39 by operator number 21.

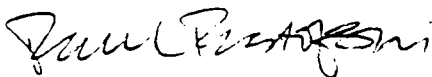
The spill involved a small release of a raw material fatty acid, Aconew 500, from a tank wagon as it pulled away from our plant at 46 Albert Ave in Newark. Since this spill was reported, we have determined that this material is not a hazardous substance according to New Jersey definition, making the incident non-reportable.

Therefore, a full confirmation report under 7:1E-5.8 will not be prepared for this incident and this letter should serve to close out the case.

For your information, the spill was immediately cleaned up and placed into containers for proper off-site disposal.

If you have any questions, please call me at 919-990-7836.

Sincerely,



Paul Brustofski

cc: M. Baxi - RCI/Newark

**Reichhold Chemicals, Inc.**

Corporate Headquarters  
P.O. Box 13582  
Research Triangle Park, NC 27709-3582

March 25, 1993

**REICHHOLD**

Bureau of Discharge Prevention  
NJDEPE  
401 East State Street  
CN 027  
Trenton, NJ 08625-0027  
ATTN: Discharge Confirmation Report

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Sincerely,



Paul Brustofski

cc: M. Baxi - RCI/Newark

REICHOLD CHEMICALS, INC.  
46 ALBERT AVENUE  
NEWARK, NJ 07105

FAX (201) 589-2898  
TELEPHONE (201) 589-3876

Date 03/25/93  
Time 02:27 PM

Please deliver immediately to:

Dave Leivent

Firm Name: Cycle Chem  
Address: 82 Midland Avenue, Saddle Brook,  
Fax #: 340-9860

There are 8 pages including this cover page.

Comments:

Enclosed please find the  
MDS for the spill material, we  
cleaned with Speedy dry. There are  
3 drums 90% Speedy dry, 10% Fatty  
Acid & 0.1% other debris

From: Mike Bax

842899986

HERCULES INCORPORATED

Box 1000, Plaza

Wilmington, DE 19894

Phone #: (302) 594-5000 (24 hrs)

PAMAK\* 4, 4A, 4SW, 4-47, W4, WCFA

Distilled tall oil fatty acids

ACONEN 500

MSDS No.: 676 4012 0100-04

03650

Supersedes MSDS No.: 676 4012 0100-3

Date: 09/22/89

I. PRODUCT IDENTIFICATION

CAUTION| MAY CAUSE MILD TEMPORARY EYE AND SKIN IRRITATION.

PAMAK\* 4, 4A, 4SW, 4-47, W4, WCFA  
Distilled tall oil fatty acids (2)

HMIS RATINGS:(1)

Health hazard: 1 Slight  
Flammability hazard: 1 Slight  
Reactivity hazard: 1 Slight

CAS Number: (61790-12-3) PAMAK 4, 4A,  
4SW, 4-47

CAS Number: (8002-26-4) PAMAK W4, WCFA

APPEARANCE AND ODOR: Yellow-amber, slightly viscous liquid; fatty odor

(2) PAMAK products are composed of fatty acids and varying amounts of resin (rosin) acids. The fatty acids are mainly straight chain, 18-carbon mono- and di-unsaturated acids, including oleic and linoleic acid.

\* Registered Trademark of Hercules Incorporated.

II. HAZARDOUS INGREDIENTS & EXPOSURE LIMITS

CHEMICAL & COMMON NAMES:

§

RECOMMENDED AIRBORNE LEVELS(1)

OSHA TWA TLV-TWA 1988-89

Fatty acids

89-94

Not established.

FOOTNOTES

(1)Explanation of acronyms:

HMIS: Hazardous Materials Identification System rating for product as supplied.

OSHA: Occupational Safety and Health Administration.

TLV: Registered trademark of American Conference of Governmental Industrial Hygienists for Threshold Limit Values.

TWA: Time Weighted Average

N/A: Not applicable

Hercules Incorporated has compiled the information and recommendations contained in this Material Safety Data Sheet from sources believed to be reliable and to represent the most reasonable current opinion on the subject when the MSDS was prepared. No warranty, guaranty or representation is made as to the correctness or sufficiency of the information. The user of this product must decide what safety measures are necessary to safely use this product, either alone or in combination with other products, and determine its environmental regulatory compliance obligations under any applicable federal or state laws.

842899987



-----  
 TYPICAL PHYSICAL & CHEMICAL CHARACTERISTICS  
 -----

BOILING POINT: Above 150 C (302 F)      SOLUBILITY IN WATER: Slight  
 VAPOR PRESSURE AT 20 C: < 1 mm Hg      SPECIFIC GRAVITY: 0.91  
 VAPOR DENSITY: Heavier than air      pH: N/A  
 VOLATILE (VOL.),%: Negligible at 20 C      EVAPORATION RATE: Slower than butyl acetate  
 FREEZING POINT: Congeals below 10 C (50 F)

-----  
 FIRE, EXPLOSION, & REACTIVITY HAZARD DATA  
 -----

FLASH POINT: Above 150 C (300 F)  
 FLAMMABLE LIMITS: N/A  
 AUTOIGNITION TEMPERATURE: 315-371 C (600-700 F)  
 EXTINGUISHING MEDIA: Water spray, dry chemical, foam, carbon dioxide, or halon  
 SPECIAL FIREFIGHTING PROCEDURES:  
 Use self-contained breathing apparatus.  
 Cool containers with water if exposed to fire.

USUAL FIRE AND EXPLOSION HAZARDS: None

STABILITY CONSIDERATIONS:

Stable. Conditions to avoid: Spontaneous heating may occur in such items as rags, insulation, and trash soaked with this material and exposed to air.

INCOMPATIBILITY WITH: None known.

HAZARDOUS DECOMPOSITION PRODUCTS: None

HAZARDOUS PRODUCTS OF COMBUSTION:

Carbon monoxide and carbon dioxide. Depending on conditions, some aliphatic aldehydes and carboxylic acids also may be formed.

HAZARDOUS POLYMERIZATION: Will not occur.

-----  
HEALTH HAZARD DATA  
-----

CAUTION| MAY CAUSE MILD TEMPORARY EYE AND SKIN IRRITATION.

## SIGNS AND SYMPTOMS OF OVEREXPOSURE IN THE WORKPLACE:

EYES: May cause mild, transient eye irritation.  
SKIN: Prolonged contact may cause mild transient skin irritation.  
See below: MEDICAL CONDITIONS GENERALLY RECOGNIZED AS BEING  
AGGRAVATED BY EXPOSURE.  
INGESTION: None known.

## EMERGENCY &amp; FIRST AID PROCEDURES:

EYES: In case of contact, immediately flush with plenty of low-pressure water for at least 15 minutes. Remove any contact lenses to ensure thorough flushing. Call a physician.

SKIN: Wash with soap and running water.

INGESTION: If swallowed, do NOT induce vomiting. Call a physician.

-----  
MEDICAL CONDITIONS GENERALLY RECOGNIZED AS BEING AGGRAVATED BY EXPOSURE:

These products contain rosin or a rosin derivative. Rosin and some of its derivatives have been reported to cause an allergic skin reaction (sensitization) in susceptible individuals under certain non-industrial exposure conditions of repeated and prolonged skin contact. Individuals sensitized to rosin derivatives may also react to these products after skin contact. Hercules is unaware of any allergic skin reactions caused by industrial exposure to these products or similar materials. A thorough search of Hercules medical records has disclosed no case of skin sensitization to rosin or its derivatives from industrial exposure in our workers. None have been reported by our customers.

PRIMARY ROUTES OF ENTRY: Eyes, skin

## CANCER INFORMATION:

The components of these products are NOT listed as carcinogens by the National Toxicology Program (NTP). They are NOT regulated as carcinogens by the Occupational Safety and Health Administration (OSHA) and have NOT been evaluated by the International Agency for Research on Cancer (IARC).

## REPORTED HUMAN EFFECTS:

These PAMAK products are composed of tall oil derived fatty acids and small (varying) amounts of resin (rosin) acids. Many of the fatty acids found in this product are common components of the human diet. These products also contain small amounts of resin (rosin) acids.

Continued...

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HEALTH HAZARD DATA

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REPORTED HUMAN EFFECTS: ...Continued

LINOLEIC ACID: In a dietary study in humans, ingestion of large amounts of linoleic acid caused changes in platelet functions (decreased platelet activation).

OLEIC ACID: None reported.

RESIN (ROSIN) ACID: These products contain small amounts of resin (rosin) acids. (See above: MEDICAL CONDITIONS GENERALLY RECOGNIZED AS BEING AGGRAVATED BY EXPOSURE.)

REPORTED ANIMAL EFFECTS:

A 90-day dietary study with rats fed diets containing up to 25% of a tall oil derived fatty acid fraction of similar composition to these PAMAK products. No test material related effects were noted.

LINOLEIC ACID: Oral LD50, mouse - Above 3200 mg/kg.

Oral LD50, rat - Above 3200 mg/kg.

Dermal LD50, guinea pig - Above 20 ml/kg.

Linoleic acid caused slight skin irritation in guinea pigs under an occlusive wrap for 24 hours.

OLEIC ACID: Oleic acid produced slight irritation to the skin and eyes of rabbits. Oral LD50, rats - 64 ml/kg. Rats fed diets containing up to 25% oleic acid for 90 days exhibited no effects that could be attributed to the test material. Oleic acid caused chromosome aberration in yeast (*Saccharomyces cerevisiae*) and in hamster fibroblast cells.

RESIN (ROSIN) ACID: These products contain up to 12% resin (rosin) acids. Two-year feeding studies have been conducted in dogs and rats with rosin. At a dietary level of 1% rosin, the rats showed a slight decrease in body weight gain and both species showed increased liver sizes. Microscopic examination of the liver and other tissues did not reveal any abnormalities that could be attributed to the test material. At dietary levels of 0.2% or less, the rats and dogs did not have any abnormalities that could be related to the resin (rosin) acids.

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I. SPILL PROCEDURES & WASTE DISPOSAL

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PILL PROCEDURES:

Scrape up and salvage in metal containers. Soak up small spills with earth sand. Wash area with detergent and water.

AS DISPOSAL METHOD:

Incineration of combustible wastes in permitted facilities is the preferred disposal method.

Refer to Section VIII for specific Federal Environmental and Regulatory Data regarding use or disposal of this product.

842899990

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||| APPLICABLE CONTROL MEASURES  
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APPROPRIATE HYGIENIC PRACTICES:

- Avoid contact with eyes, skin, and clothing.
- Wash thoroughly after handling, and before eating, drinking or smoking.
- Remove contaminated clothing promptly and clean thoroughly before reuse.

PERSONAL PROTECTIVE EQUIPMENT:

- Impervious gloves
- Safety glasses
- Appropriate protective clothing

WORK PRACTICES:

- Eyewash fountains and safety showers should be easily accessible.
- Discard properly such items as rags, insulation, and trash soaked with this material and exposed to air, as spontaneous heating may occur.
- Handle in areas with adequate ventilation. Use a respirator in accordance with OSHA Subpart I (29 CFR 1910.134), if mist and vapor levels are excessive.

HANDLING AND STORAGE PRECAUTIONS: None

ENGINEERING CONTROLS: Provide adequate ventilation.

ROUTINE MEASURES DURING REPAIR AND MAINTENANCE:

- Keep area clean. Product will burn.
  - Completely isolate and thoroughly clean all equipment, piping or vessels before beginning maintenance or repairs.
-

-----  
ENVIRONMENTAL REGULATORY DATA  
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The following Environmental and regulatory data are provided to assist users of this product in defining their regulatory environmental compliance obligations.

## PRODUCT COMPOSITION

PRODUCT (P) or COMPONENT NO.	TRADE NAME or CHEMICAL COMPONENT	CAS NUMBER	WT. PERCENT
P	PAMAK* 4, 4A, 4SW, 4-47	61790-12-3	100
P	PAMAK* W4, WCFA	8002-26-4	100

## SARA TITLE III (See footnotes)

COMPONENT NO.	SEC. 304 EHS RQ (lbs)	SEC. 302 EHS TPQ (lbs)	SEC. 311/312 HAZARD CATEGORY	SEC 313 TOXIC CHEMICAL (YES, NO)
P	N/A	N/A	HC-1, NPH	NO

## CERCLA (40 CFR 302.4 HAZARDOUS SUBSTANCE &amp; REPORTABLE QUANTITIES)

This product does NOT contain any hazardous substances listed in 40 CFR 302.4

## RCRA INFORMATION

This product is not listed in federal hazardous waste regulation 40 CFR 261.33, paragraph (e) or (f) - i.e., chemical products that are considered hazardous if they become wastes. It does not exhibit any of the hazardous characteristics listed in 40CFR261, Subpart C. State or local hazardous waste regulations may apply if they are different from the federal regulation.

## OTHER

None.

Continued...

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VIII. ENVIRONMENTAL REGULATORY DATA  
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...Continued

## FOOTNOTES:

SEC. 302 - Threshold Planning Quantity, Extremely Hazardous Substance (EHS) (40 CFR 355 Emergency Planning and Notification regulations)  
N/A: Product does NOT contain an EHS.

SEC. 304 - Reportable Quantity for Releases of an EHS (40 CFR 355, Appendix A)  
N/A: Product does NOT contain an EHS.

SEC 311/312 - 40 CFR 370 Hazardous Chemical Reporting Requirements "Hazard Categories"

HC-1 Immediate (acute) health hazard  
HC-2 Delayed (chronic) health hazard  
HC-3 Fire hazard  
HC-4 Sudden release of pressure hazard  
HC-5 Reactive hazard  
NHH Not a health hazard  
NPH Not a physical hazard

SEC 313 - 40 CFR 372 Toxic Chemical Release Reporting Requirements

This product does NOT contain toxic chemicals subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372 Toxic Chemical Reporting requirements.

-----  

Doc. No. 1909s

842899993